# Maryland Department of Health Mental Hygiene Maryland Medical Cannabis Commission ("MMCC")

# **Application for Medical Cannabis Grower License**



Natalie M. LaPrade

Maryland Medical Cannabis Commission

Publication Release Date: September 28, 2015; Revised October 7, 2015

Application Response Deadline:
Accepting Applications Period: September 28, 2015–November 6, 2015
Business Days: M–F, 8:00 am–4:00 pm

For additional information regarding the Application process, please contact:

Natalie M. LaPrade Medical Cannabis Commission

Department of Health and Mental Hygiene

Dedicated Email Address for Applicant Questions:

dhmh.medicalcannabisApplications@maryland.gov

T:



APPLICATION INFORMATION SHEET COMPANY NAME | Harvest of Maryland STREET ADDRESS 449 S. 48th St. Suite 105 CITY, STATE, ZIP Tempe, AZ, 85281 4 **TELEPHONE NUMBER** AREA CODE NUMBER: **EXTENSION:** 480 759-9622 Extension 5 **FAX NUMBER AREA CODE** NUMBER: **EXTENSION:** 480 718-8442 Extension 6 **TOLL FREE NUMBER** AREA CODE NUMBER: **EXTENSION:** Area Code Number Extension Contact Person for providing information, signing documents, or ensuring actions are taken per COMAR 10.62.08-.18 Name: Steve White Title: Chief Executive Officer Address: 1075 W. Todd Dr. Tempe, AZ 85283 Email Address: swhite@wbazlaw.com 8 TELEPHONE NUMBER AND FAX FOR CONTACT PERSON AREA CODE **TELEPHONE NUMBER: EXTENSION:** 480 626-2783 Extension **AREA CODE FAX NUMBER:** 480 718-8368 9 **CONTACT PERSON SIGNATURE** SIGNATURE: DATE:

11/6/2015



#### **TABLE OF CONTENTS**

SECTION	SECTION TITLE	PAGE NUMBER
Α	Introduction	5
В	Number of Grower Licenses	5
С	Grower Intention to Operate A Dispensary	5
D	Grower Intention to Operate As a Processor	6
E	Terms and Definitions	6
F	Application Timeline	8
G	Application Submission Instructions	8
Н	Evaluation and Selection Procedures	9
1 121002-942013-38030aux	Important Notices/Disclaimers	11
J	Communications with MMCC	12
K	Consent for Investigation	12
L	Waiver of Any Contractual, Statutory, or Common Law Obligation of Confidentiality	12
М	Data Practices	13
N	Amending an Application	14
0	Criminal History Record Check	14
P	How to Apply	14
Q	Awarding of License Pre-Approval	16
R	Rescission of Dispensary License	17
S	Denial or Disqualification of Application or Pre-Approval of a License	17
re l	Application Ranking and Weighted Criteria	17
J	Affirmation Section	19



# FORMS/Addenda CHECKLIST

FORM/Exhibit #	Name/Description of Exhibit	Included Yes	Not Included
Form 1	Consent for Investigation – Individual/Grower Agent	A. Y	
Form 2	Consent for Investigation – Business Entity		
Form 3	Trade Secret & Business Data Notification		
Form 4	Business Interest Identification & Authorization Form		
Form 5	Investors, Agents, Owners & Managing Director Certification Statement		
Addenda			



## **SECTION A: INTRODUCTION**

# Maryland Department of Health and Mental Hygiene Natalie M. LaPrade Maryland Medical Cannabis Commission

# **Medical Cannabis Grower License Application**

The State of Maryland, Department of Health and Mental Hygiene Natalie M. LaPrade Maryland Medical Cannabis Commission ("MMCC" or "Commission") is seeking Applications from qualified Applicants interested in receiving a Medical Cannabis Grower License.

On October 1, 2013, the Commission became responsible for administering Maryland's Medical Cannabis program, the effective date of the enactment of Ch. 403, Laws of Maryland (2013); subsequently amended by Ch. 240, 256, Laws of Maryland (2014); and Ch. 251, Laws of Maryland (2015), also referred to as the Maryland Session Laws. The Commission develops policies, procedures, and regulations to implement programs to make medical cannabis available to patients in a safe and effective manner. The Commission will license medical cannabis Growers, Processors, and Dispensaries. This Program allows a qualifying patient or caregiver who is registered with MMCC to purchase medical cannabis from a licensed dispensary. See also Md. Code, Health-Gen §§13-3301-13-3316; COMAR §§10.62.01-10.62.35.

The Commission intends to award licenses to Applicants that most efficiently and effectively ensure public safety and safe access to medical cannabis.

## **SECTION B: Number of Grower Licenses**

In accordance with Md. Code, Health-Gen §13-3306(a)(2)(i), MMCC anticipates awarding preapproval for a maximum of 15 Grower Licenses. This Application does not obligate the Commission to license any Applicant or any Medical Cannabis Grower. The Commission reserves the right to award fewer than 15 licenses.

An investor may apply for only one grower license, but otherwise may apply for multiple licenses across any other category (processor or dispensary). However, if granted a license, in any category, a Licensee shall only be permitted to hold one license in each category (e.g., may only hold one grower, one processor, and one dispensary license).

# SECTION C: Grower Intention to Operate a Dispensary

A Grower planning to operate a medical cannabis dispensary must submit a separate Dispensary Application.



# SECTION D: Grower Intention to Operate as a Processor

A Grower planning to operate a medical cannabis processing facility must submit a separate Processor Application.

# SECTION E: TERMS AND DEFINITIONS

Please refer to the COMAR Regulations in Section 10.62.01 "Definitions," which are applicable to all MMCC license Applications. The Regulations are posted on the Maryland Medical Cannabis Commission's website at http://mmcc.maryland.gov.

For the purposes of this Application, the following terms and definitions will be used.

TERM	DEFINITION
Annotated Code of Maryland	Maryland's statutory law created by the State Legiclature, the General Assembly.
Applicant	A person or entity applying for a license
Audited Financial Statement	An audited financial statement is: (a) Performed by a certified public accountant licensed or with practice privileges in
	Maryland pursuant to Business Occupations and Professions Article, Title 2, Annotated Code of Maryland; (b) Prepared in accordance with the Professional Standards of the American
· Control of the control of	Institute of Certified Public Accountants; and (c) In the case of a publicly owned corporation, in conformity with the standards of the Public Company Oversight Board.
COMAR	Maryland State Regulations issued by State agencies.
Commission	The Natalie M. LaPrade Medical Cannabis Commission.
Caregiver	An individual 21 years old or older designated by a patient who has agreed to assist with a qualifying patient's medical use of medical cannabis, and for a qualifying patient younger than 18 years old, a parent, or legal guardian.
Grower Agent	An owner, an employee, a volunteer, an officer, or a director of a licensed grower.
Independent Testing Laboratory	A facility, or an entity, registered by the Commission that offers or performs tests related to the inspection and testing of cannabis and products containing cannabis in the State of Maryland.



TERM	DEFINITION
Licensed Dispensary	An entity licensed by the Commission that acquires, possesses, repackages, processes, transfers, transports, sells, distributes, or dispenses, products containing medical cannabis, related supplies, related products including tinctures, aerosols, oils, or ointments, or educational materials for use by a qualifying patient or caregiver.
Licensed Grower	An entity licensed by the Commission that cultivates, manufactures, packages or distributes medical cannabis to licensed processors, licensed dispensaries or registered independent testing laboratories.
Maryland Entity/Entity	A business entity registered to do business in the State of Maryland.
Maryland Residency	One who lives in Maryland.
Medical Cannabis	Any product containing usable cannabis or medical cannabis finished product.
Maryland Resident	See Maryland Residency.
Medical Cannabis Concentrate	A product derived from medical cannabis that is kief, hashish, bubble hash, oil, wax, or other product, produced by extracting cannabinoids from the plant through the use of:  (a) Solvents; (b) Carbon dioxide; or (c) Heat, screens, presses or steam distillation.
Medical Cannabis Finished Product	Any product containing a medical cannabis concentrate or a medical cannabis infused product packaged and labeled for release to a qualifying patient.
Medical Cannabis Infused Products	Any oil, wax, ointment, salve, tincture, capsule, suppository, dermal patch, cartridge or other product containing medical cannabis concentrate or usable cannabis that has been processed so that the dried leaves and flowers are integrated into other material. (b) "Medical cannabis-infused product" does not include a food as that term is defined in Health-General Article, §21-101, Annotated Code of Maryland.
Must/Shall	The referenced action is "Mandatory" and not discretionary.
Pre-Approval of License	An approval of a potential authorization (license) to conduct business as a licensed grower.
Processor	One who manufactures usable medical cannabis into a medical cannabis concentrate, or manufactures a medical cannabis-infused product.
State	The State of Maryland, Department of Health & Mental Hygiene, or the Natalie M. LaPrade Medical Cannabis Commission.



TERM	DEFINITION		
Site Plan	A drawing and brief description of the preliminary plan for the locations of any and all buildings and any and all security measures, including walls and doors within the facility.		
Third Party Reviewers	An independent reviewer (or entity) hired to assist the Commission in the evaluation of Applications.		
Transportation Agent	A registered grower agent, registered processor agent or a registered dispensary agent, authorized by the license to transport products containing medical cannabis, who meets the criteria specified in COMAR 10.62.18; or a licensed and bonded courier of a secure transportation company.		

## **SECTION F: APPLICATION TIMELINE**

The following represents the timeline for this project.

TASK	DATE/TIME
Applications Posted on Website	Week commencing September 28, 2015
Deadline for Submission of Applications (hard copy, electronic copy and payment) to the Commission	40 calendar days after the Application is posted
Application Evaluation, Scoring and Ranking Period by Third Party Reviewers	Anticipated completion in December 2015 / January 2016
Commission Vote on Stage One Applications at Public Meeting	Anticipated in December 2015 / January 2016
Notice of Stage One Awards via Email	Anticipated in December 2015 / January 2016
Posting of Stage One Awards on website	Anticipated in December 2015 / January 2016
Site Visits/Inspections of Stage One Applicant Premises	Following request of Applicant for inspection.
Granting licenses by the Commission.	Following request of Applicant for final inspection.

#### Stage 1: Selection

Once the Stage 1 Applicants have been determined, the Applicant must request an inspection of the Applicant's growing, cultivation, and processing (if applicable) operations as evidence of their expertise and compliance.

#### Stage 2: Final Approval

Upon selecting the successful Applications, the Commission shall notify all Applicants of their status by email and in writing. The Commission's decision to award or not award a license to an Applicant shall be final.



If a Licensee cannot commence operations within 365 days of being issued a pre-approval, the Commission may rescind the pre-approval.

### SECTION G: APPLICATION SUBMISSION INSTRUCTIONS

Applicants must submit a complete Application package by the deadline outlined in Section F. The Application package will consist of the following:

- A hard copy of the Applicant's completed Application and all related documents (as outlined in Section H),
- 2. An electronic copy of the Applicant's Application and all related documents (as outlined in Section H) in Microsoft Word format on a USB drive, and
- The Application payment to MMCC in the form of a cashier's check or money order, only. The Application fee will be retained by the Commission and will not be returned under any circumstances.

The Application is only considered complete if all of these components are submitted. The Applicant is responsible for delivery of all of the Application material to MMCC on or before the deadline indicated in Section F. Any Applications or related documents received after the deadline will not be accepted or considered.

Other than the redacted material, the information provided in the hard copy and electronic copy of the Application should be identical. The hard copy of the Application will be retained by MMCC for its records. Only the information that is submitted in the electronic copy of the Application as well as the electronic related documents will be sent to evaluators for review.

Applicants must use the following file naming structure when submitting electronic documents: "Applicant Name\_Submission Date\_ File Type." For example, the Word document file name would be "John Doe\_10012015\_Application." In contrast, the site plan file name would be "John Doe\_10012015\_Site Plan."

To ensure the integrity of the evaluation process, specific sections of the electronic copy of the Application and related documents will be redacted for the evaluation. It is the responsibility of the Applicant to redact this information in the electronic copy of the Application. Further details on what information should be redacted are outlined in Section H.

# **SECTION H: Evaluation and Selection Procedures**

The Regional Economic Studies Institute (RESI) of Towson University has been commissioned by MMCC to conduct an evaluation of the license Applications. This section will review the evaluation process.



MMCC will upload electronic copies of all Applications and related documents where the Applicant has successfully sent payment within the timeline specified in Section F onto a Secure File Transfer Protocol (SFTP) for RESI to download. RESI will review every Application that is transferred to RESI by MMCC through the SFTP to ensure that it meets the mandatory qualification criteria, including the three following points:

- All sections of the Application that are marked as mandatory with an asterisk (\*) are completed;
- 2. The checkboxes in Section U are marked with an affirmation to all questions posed; and
- 3. The electronic version of the Application (Microsoft Word document) and related documents are submitted as redacted documents.

The Word document must be devoid of any identifying information after Form 5, including the Applicant's name, the company name of the Applicant (if applicable), and the names of any investors and/or employees. The related documents must be devoid of any identifying information including the Applicant's name, the company name of the Applicant (if applicable), and the names of any investors and/or employees. Only the redacted Word document and related documents will be sent to evaluators if the Application meets the mandatory qualification criteria. Any Application that does not comply with these mandatory qualification criteria will be removed from the Application process and will not be evaluated.

RESI will process the Applications that meet the mandatory qualification criteria. RESI will assign unique identifying numbers to each Application and will separate each Application into sections. RESI has contracted a panel of third party evaluators, which will be composed of subject matter experts (SMEs) from across the country. Each SME will review assigned sections of the Application that align with the SME's field of expertise. The SME will be sent these sections via email. As each SME will not review the entire Application, it is of the utmost importance that the information outlined in each section of the Application is provided in that section. If section-specific information is found outside the section in which it should be, the SME will not consider that information during the evaluation process. In addition, each section has a set word count. If the word count in a section is exceeded, the SME will not review any information beyond the maximum number of words nor will the SME take into account this information during the evaluation.

Each Application section will be scored by the respective SME according to the quality of the responses provided. The scoring of the Application sections will be based on a scale of 1 to 5 as well as yes/no questions. The yes/no questions will focus on specific issues that are clearly set out in the grower regulations and that do not need further explanation from the Applicant. The scoring scale will be used to evaluate the questions that cannot be scored as yes/no and therefore need further explanation from the Applicant. Using this scale, a 3 will be given to Applications that meet the basic requirements set forth in the aforementioned regulations. A score of 1 will be given to Applications that fall significantly below meeting these basic requirements, and a score of 5 will be given to Applications that significantly exceed the basic requirements. An Application will receive a score of 0 in any section where the SME notices an egregious problem or error within that section. Any Application section receiving a 0 will be



reviewed separately by the Commission to determine if the Application will continue in the evaluation process.

Using the scores provided by the SMEs in the evaluation panel, RESI will aggregate the scores from each Application, taking into account the weighting outlined in Section T of this document. RESI will rank the Applications based on these scores for the Commission to review. The Commission will make the final decision on issuing any grower licenses.

## **SECTION I: IMPORTANT NOTICES/DISCLAIMERS**

This Application form is an OFFICIAL DOCUMENT of the Maryland Medical Cannabis Commission. It MAY NOT be altered or changed in any fashion except to fill-in the areas provided with the information that is required. Should any alteration or revision of a question occur, the Commission reserves the right to deny the Application in its entirety, or may determine to attribute no weight to the response.

- The license to operate as a grower is a privilege.
- The burden of proving an Applicant's qualifications at all times rests on the Applicant.
  The Applicant accepts any and all risk of adverse public notice, criticism, emotional
  distress, or financial loss that may result from any action with respect to this
  Application. The Applicant expressly waives any and all claims for damages as a result
  thereof.
- The Commission may deny an Application that contains a misstatement, omission, misrepresentation, or untruth.
- An Application shall be complete in every material detail, including all of the mandatory sections that are marked with an asterisk (\*).
- If the electronic version of the Application cannot be read by MMCC, the Application will
  be suspended and not reviewed, and the Applicant will be contacted by email. The
  Applicant has 3 business days from the date when the email is sent to deliver another
  USB drive containing the electronic version of the Application to the Commission. In the
  event that the Applicant fails to comply, the Application will be withdrawn and the fee
  may be forfeited to the Commission.
- The Commission will notify Applicants via email when their Applications are successfully received.
- The Commission may request any additional information that it determines is necessary
  to process and fully investigate an Application. The Applicant shall provide all
  information, documents, materials, and certifications at the Applicant's own expense.
- Should the Commission request any additional information that it determines is
  necessary to process and fully investigate an Application, the Applicant shall provide the
  additional information within 14 business days after the request has been sent to the
  Applicant. If the Applicant does not provide the requested information within 14
  business days, the Commission will remove the Application from the evaluation process.
- The Applicant is not able to contribute additional information after the Application is submitted, unless the Commission requests more information.



- The Applicant is under a continuing duty to promptly disclose to the Commission any changes in investors with an interest of five percent or more. The duty to make such additional disclosures shall continue throughout any period of any license that may be granted by the Commission.
- All notices regarding an Application submission will be sent to the email address provided on this form. The Applicant must immediately notify the Commission if the email address changes.
- An Applicant who applies for and obtains a license from the Commission may be required to submit to warrantless searches as stated in the law or regulation.
- After the Application has been submitted, the Applicant may withdraw the submitted Application only after written notice to the Commission.
- All submissions with and for this Application become the property of the Commission and will not be returned.
- The Commission's decision to approve or deny an Application is final.

## **SECTION J: Communications with MMCC**

All questions about the Application or Application process must be forwarded to MMCC by email only at <a href="mailto:dhmh.medicalcannabisApplications@maryland.gov">dhmh.medicalcannabisApplications@maryland.gov</a> with the subject line "Medical Cannabis Application Question."

- Questions and answers of a substantive nature will be posted on the MMCC website (<a href="http://mmcc.maryland.gov/">http://mmcc.maryland.gov/</a>) so that all Applicants will have access to the same information.
- For questions received after Friday, October 23, 2015, the Commission may not respond prior to the submission deadline. Applicants are therefore encouraged to identify and raise any questions as soon as possible.
- All questions must be sent to the Commission email address only. Violation of this guideline will result in disqualification.

# SECTION K: Consent for Investigation - COMAR Section 10.62.08.04 (A)

An individual who is required to provide personal and background information under this chapter shall provide a statement that irrevocably gives consent to the Commission and persons authorized by the Commission to:

- 1. Verify all information provided in the Application documents; and
- 2. Conduct a background investigation of the individual.

# SECTION L: Waiver of Any Contractual, Statutory, or Common Law Obligation of Confidentiality – COMAR Section 10.62.08.04 (B) (C)

An Applicant shall waive any contractual, statutory, or common law obligation of confidentiality and authorize any government agency in any jurisdiction to release to and provide access to the



Commission of any and all information that the Applicant has provided to any other jurisdiction while seeking a cannabis-related license in that other jurisdiction, as well as the information obtained by that other jurisdiction during the course of any investigation it may have conducted regarding the Applicant.

An Applicant shall release all financial institutions, fiduciaries, and other parties from any contractual, statutory, or common law obligation of confidentiality to provide financial, personal, and background information to the Commission relevant to the Applicant's capacity to manage a licensed growing facility and the Applicant's good moral character.

## SECTION M: Records & Maryland Public Information Act

All materials submitted in response to this Application will be retained by MMCC. All pages containing confidential information must be marked "Confidential."

Data submitted during the Application process, including private data on individuals or nonpublic data, may or may not be disclosed pursuant to the Maryland Public Information Act ("MPIA"). Md. Code., Gen'l Prov §§4-101-601. While there are exceptions to production contained in the statute, and certain common law privileges may apply to the data, MMCC cannot guarantee that all data submitted to it will remain confidential at all times. Be advised, however, that the MPIA does contain provisions that relate to data that is a trade secret or that contains financial information. Md. Code, Gen'l Prov §§4-335, 36. MMCC recommends that the Applicant review the applicable law prior to submitting an Application as MMCC is unable to provide legal advice as to the absolute confidentiality of the data received.

Be further advised, that if a license is awarded to an Applicant, MMCC may use or disclose the trade secret or financial data to the extent provided by law. Any decision by the State to disclose information determined to be trade secret information or financial data will be made consistent with the MPIA and other relevant laws and regulations. Maryland Public Information Act ("MPIA"). Md. Code., Gen'l Prov §§4-101-601.

If the Applicant submits information in response to this Application that the Applicant believes to be trade secret information or financial data as defined by Maryland Statutes section Md. Code, Gen'l Prov §4-335-36, and the Applicant does not want such data used or disclosed for any purpose other than the evaluation of this proposal, the Applicant shall:

- A. Clearly mark every page of trade secret or financial materials in its proposal at the time the proposal is submitted with the words "<u>TRADE SECRET OR</u> <u>FINANCIAL DATA INFORMATION</u>" in capitalized, underlined and bolded type that is at least 20 pt.
- B. Acknowledge that the State does not assume liability for the use or disclosure of unmarked or unclearly marked trade secret information;
- C. Fill out and submit the attached "Trade Secret & Financial Data Information Notification Form," specifying the pages of the proposal that are to be restricted



and justifying the trade secret designation for each item. If no materials is designated as trade secret information or financial data, a statement of "None" should be listed on the form; and

D. Satisfy the statutory burden to justify any claim of trade secret information. MMCC may reject a claim that any particular information in a response is trade secret information if it determines that the Applicant has not met the burden of establishing the content to be trade secret information under any circumstance. Use of generic trade secret language encompassing substantial portions of the proposal or simple assertions of trade secret interest without substantive explanation of the basis therefore will not be sufficient to warrant a trade secret designation. If certain information is found to constitute a "trade secret" or "financial" exception to disclosure, then, the remainder of the Proposal will become public in the event a public information request is received. Applicants should understand that only the trade secret or financial data will be redacted prior to disclosure.

The Applicant must defend any action seeking release of the materials that it believes to be trade secret information, and indemnify and hold harmless the State, its agents, and employees, from any judgments against the State in favor of the party requesting the materials, and any and all costs connected with that defense. This indemnification survives the State's award of a license. In submitting an Application, the Applicant agrees that this indemnification survives as long as the trade secret information is in the possession of MMCC.

MMCC is required to keep all Grower Application documents in accordance with the document retention schedule adopted by the Commission after the conclusion of the license term. Non-selected Grower Applications will be kept by MMCC for a minimum of three years after the award of the licenses or the close of any related litigation.

# SECTION N: AMENDING AN APPLICATION - COMAR 10.62.08.02 (G)

In the event that an Applicant amends the Application to include either a new individual investor with an interest of 5 percent or more, or another manager or director of the entity, then the Applicant shall forward to the Commission a copy of the request to the Central Repository.

# SECTION O: Criminal History Record Check – COMAR Section 10.62.08.03

For each individual identified in the Application, an Applicant shall provide to the Director of the Central Repository:

 Two sets of legible fingerprints taken in a format approved by the Central Repository and the Director of the FBI together with the fee authorized under Md. Code Ann., Criminal Procedure Article §10-221(B)(7), for access to State criminal history and records for each medical cannabis grower agent and investor identified in the Application; and



2. A request that the individual's State and national criminal history record information be forwarded to the Commission.

## **SECTION P: How to Apply**

It is recommended all potential Applicants become familiar with Md. Code, Health-Gen §§13-3301-13-3316; COMAR §§10.62.01-10.62.35.; Ch. 403, Laws of Maryland (2013); Ch. 240, 256, Laws of Maryland (2014); and Ch. 251, laws of Maryland (2015), governing grower operations for the Medical Cannabis program.

Applicants should use the definitions and descriptive sections of those documents to assist in interpreting this Application. The burden of proving an Applicant's qualifications rests solely on the Applicant.

#### **GENERAL APPLICATION INSTRUCTIONS**

Read each question carefully. Answer each question completely. Do not leave blank spaces. If a question does not apply, write "Does Not Apply" or "N/A." If the correct answer to a particular question is "None," write "None." If a question has an asterisk (\*), it is mandatory and must be completed. Answering a mandatory question with "Does Not Apply" or "N/A" is insufficient. Failure to submit an Application with all of the mandatory questions completed will result in the removal of the Application from the evaluation process.

- All entries on the Application should be single spaced and typed in 12-point Times
  New Roman font. Signatures must be in handwriting, unless otherwise stated by the
  Commission, by the individual providing the information. Do not misstate or omit any
  material fact(s).
- All required documentation, such as business formation papers, tax returns and appendices, as well as the Application forms that comprise an Application package for a license, as listed above, must be submitted at the time of filing this Application.
   Further, the Applicant is under a continuing duty to promptly notify the Commission if there is a change in the information provided to the Commission.
- An Applicant shall clearly identify those portions of its Application that it deems to be confidential, proprietary commercial information, trade secrets, or financial data and provide justification of why such materials, upon request, should not be disclosed by the State pursuant to the MPIA, Md. Code., Gen'l Prov §§4-101-601. Confidential information may be contained in the Application. A blanket statement by an Applicant that its entire Application is confidential is unacceptable. Applications shall be open to public inspection only after award of a license has been made, to the extent permitted by the MPIA. Applicant is advised that, upon request for this



information from a third party, the Commission will make an independent determination whether the information may be disclosed. An Applicant or Licensee waives any liability of the State of Maryland, and its employees and agents, the Commission, and the Department of Health and Mental Hygiene for any damages resulting from any disclosure or publication in any manner.

The Commission may request additional financial and other information as needed. COMAR 10.62.08.05(D)-(F).

#### APPLICATION CONTENTS

A complete Application package must include:

- A USB drive containing a redacted Microsoft Word document as well as related documents outlined in Section H;
- 2. A hard copy of the Application; and
- 3. A two thousand dollar (\$2,000) Stage 1 non-refundable Application fee in the form of a money order or a cashier's check.

The submittal of an Application constitutes acceptance of the requirements, administrative stipulations, and all of the terms and conditions of this Application. All costs and expenses incurred in submitting an Application in response to this Application will be borne by the Applicant.

#### APPLICATION DELIVERY

- It is the Applicant's responsibility to allow sufficient time to address potential delays.
- Sole responsibility rests with the Applicant to ensure that their Application is received by MMCC on or before the submission deadline.
- Applicants are required to use a courier service to deliver the Applicant contents including the contents outlined in the "APPLICATION CONTENTS" section above.
- Late Applications will not be accepted.

MMCC Delivery Address:

Attn: Precious Wells, Administrative Specialist
Maryland Department of Health and Mental Hygiene
Maryland Medical Cannabis Commission
4201 Patterson Avenue
Baltimore, MD 21215
410-764-2400



# SECTION Q: AWARDING OF LICENSE PRE-APPROVAL – COMAR Section-10.62.08.06(D)

The Commission shall notify an Applicant who has been pre-approved for a license within 10 business days of the Commission's decision.

# SECTION R Rescission of Grower License – COMAR Section-10.62.08.06(E)

The Commission may rescind the pre-approval of a grower license if the grower is not operational within 1 year of pre-approval.

## SECTION S: Denial or Disqualification of Application

MMCC may deny any Application under any of the following circumstances:

- The Application contains a misstatement, omission, misrepresentation, or untruth. COMAR 10.62.08.05(B).
- The Applicant fails to submit the Application by the submission deadline.
- The Applicant fails to pay the Application fee prior to the submission deadline.
- The criminal history record information or any other evidence demonstrates an absence of good moral character. COMAR 10.62.08.06(C)(1).
- The payment of taxes due in any jurisdiction is in arrears. COMAR 10.62.08.06 (C)(2).
- The Application fails to meet the mandatory criteria as outlined in Section G of this document.

MMCC may deny issuing a pre-approval of a license if, for any individual identified in the Application:

- The criminal history record information or any other evidence that demonstrates an absence of good moral character. COMAR 10.62.08.06(C)(1); or
- The payment of taxes due in any jurisdiction is in arrears. COMAR 10.62.08.06(C)(2).

# SECTION T: Application Ranking and Weighted Criteria – COMAR Section 10.62.08.05 (I)

# SELECTION PROCESS: Pre-Approval of License—Stage One

The Commission, or a Commission independent contractor, shall review the submitted Applications for a pre-approval for a license. The Applications shall be ranked based on the following weighted criteria.

#### DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



#### Operational Factors—20%

- A detailed operational plan for the cultivation of medical cannabis to include:
  - Summaries of policies and procedures for:
    - Cultivation;
    - Growth;
    - Processing; and
    - Packaging.

#### Safety and Security Factors—20%

- Detailed plan or information describing the security features and procedures;
- Detailed plan describing how the grower will prevent diversion; and
- · Detailed plan describing safety procedures.

#### Commercial Horticultural or Agricultural factors—15%

- · Experience, knowledge and training in:
  - o Horticultural production; or
  - Agricultural production.

#### Production Control Factors—15%

- A detailed quality control plan;
- · A detailed inventory control plan; and
- A detailed medical cannabis waste disposal plan.

#### Business and Economic Factors—15%

- A business plan demonstrating a likelihood of success, a sufficient business ability and experience on the part of the Applicant, and providing for appropriate employee working conditions, benefits and training;
- Demonstration of adequate capitalization; and
- A detailed plan evidencing how the grower will enforce the alcohol- and drug-free workplace policy.

#### Additional Factors—15%

- Demonstrated Maryland residency among the owners and investors;
- Evidence that Applicant is not in arrears regarding any tax obligation in Maryland and other jurisdictions;
- A detailed plan evidencing how the grower will distribute to dispensaries and processors; and
- A list of proposed medical cannabis varieties proposed to be grown with proposed cannabinoid profiles, including:
  - o Varieties with high cannabidiol content; and
  - Whether the strain has any demonstrated success in alleviating symptoms of specific diseases or conditions.



COMAR 10.62.08.05 (J)—For scoring purposes, the Commission may take into account the geographic location of the growing operation to ensure there is geographic diversity in the award of licenses.

# **SECTION U: Affirmation Section**

The Applicant understands the following:

1.	The burden of proving an Applicant's qualifications rests on the party applying for the license.	Yes	No
2.	The Commission may deny an Application that contains a misstatement, omission, misrepresentation, or untruth.		
3.	An Application shall be complete in every material detail.		
4.	The Commission may request any additional information the Commission determines is necessary to process and fully investigate an Application.		
	a. The party applying for the license shall provide requested additional information by the close of business of the 14th business day after the request has been received by the Applicant.		
	<ul> <li>If the party applying for the license does not provide the requested information within 14 business days, the Commission may consider the Application to be suspended.</li> </ul>		
	The Commission intends to award the licenses to the best Applications that most efficiently and effectively ensure public safety and safe access to medical cannabis.		
	The Commission, after review of the criminal history record information, may disqualify any prospective registered grower agent from registration for an absence of good moral character.		
	If there are more qualified Applications than the number of licenses available and there is a numerical tie for the last license to be issued, the last pre-approved license shall be determined by public lottery.		
3.	The Commission may deny issuing a pre-approval of a license if, for any individual identified in the Application:		. 🗆



<ul> <li>The criminal history record information or background information demonstrate an absence of good moral character; or</li> </ul>	Yes	No
b. The payment of taxes due in any jurisdiction is in arrears.		
<ol> <li>The Commission may rescind pre-approval of a grower license if the grower is not operational within 1 year of pre-approval.</li> </ol>		
10. The Commission may issue a grower license on a determination that:		
<ul> <li>The criminal history background check and background investigation reveal no evidence that demonstrates the absence of good moral character;</li> </ul>		
<ul> <li>All inspections are passed and all of the Applicant's operations conform to the specifications of the Application as pre- approved pursuant to Regulation .06 of this chapter;</li> </ul>		
c. The proposed premises:		
i. Are under the legal control of the Applicant;		
ii. Comply with all zoning and planning requirements;		
<ul> <li>iii. Conform to the specifications of the Application as pre- approved pursuant to Regulation .07 of this chapter; and</li> </ul>		
<ul> <li>The first year's license fee specified in COMAR 10.62.35 has been paid.</li> </ul>		
11. The Commission may deny transfer of an interest in a license if, for any proposed transferee:	¥	IT.
<ul> <li>The criminal history record information or the background investigation demonstrate an absence of good moral character; or</li> </ul>		
b. The payment of taxes due in any jurisdiction is in arrears.		
12. A registered grower agent's identification card remains the property		



	seizure of an identification card if the registration is revoked or expires.	Yes	No
Pleas	e review and answer the following:		
1.	The party applying for the grower license irrevocably gives consent to the Commission and persons authorized by the Commission to:	Yes	No
	<ul> <li>Verify all information provided in the Application documents and</li> </ul>		
	<ul> <li>Conduct a background investigation of the individual(s), including grower agents and investors with 5 percent or more of investment.</li> </ul>		
2.	The party applying for the grower license waives any contractual, statutory, or common law obligation of confidentiality and authorizes any government agency in any jurisdiction to release to and provide access to the Commission of any and all information the Applicant has provided to any other jurisdiction while seeking a cannabis-related license in that other jurisdiction, as well as the information obtained by that other jurisdiction during the course of any investigation it may have conducted regarding the Applicant.		
3.	The party applying for the grower license releases all financial institutions, fiduciaries, and other parties from any contractual, statutory or common law obligation of confidentiality to provide financial, personal and background information to the Commission relevant to the Applicant's capacity to manage a licensed growing facility and the Applicant's good moral character.		
4.	The party applying for the grower license is only affiliated with one grower license Application.		
5.	All grower agents affiliated with this Application are 21 years old or older at the time of Application.		
6.	None of the listed grower agents has ever been convicted of a felony drug offense.		



Follow	ing the issuance of a license, the Applicant commits to the following:	72/07	658.97
1.	All grower agents at the time of hire will be 21 years or older.	Yes	No
2.	On June 1 of each year, the Licensee will submit a report in a manner determined by the Commission regarding the Licensee's minority owners and employees.		
3.	Each medical cannabis grower agent commits to requiring that any prospective medical cannabis grower agent register with the Commission before the Applicant will employ the agent or permit the agent to volunteer for the Applicant.		
4.	The Applicant will not register a prospective grower agent if the prospective grower agent has even been convicted of a felony drug offense.		
5.	The Applicant understands that the Commission, after review of the criminal history record information, may disqualify any prospective grower agent from registration for an absence of good moral character.		
6.	While working, or on the premises, the Licensee commits to having every registered grower agent at a licensed premises visibly wear the identification card issued to the registered grower agent by the Commission at all times.		
7.	If a registered grower agent's identification card is lost, destroyed or stolen, the Licensee commits to the following within 24 hours of becoming aware of the loss, destruction or theft:		
	a. Report the loss, destruction or theft to the Commission;		
	b. Apply for a replacement card; and		
	c. Pay a replacement card fee specified in COMAR 10.62.35.01.		
8.	The Licensee acknowledges that the grower agent identification card remains the property of the Commission and the Commission may order the return or seizure of an identification card if the registration is revoked or expires.		
9.	As soon as possible after the termination of a registered grower		



the following:	Yes	No
<ul> <li>Take custody of a terminated registered grower agent's identification card;</li> </ul>		
<ul> <li>Obtain any keys or other entry devices from a terminated registered grower agent; and</li> </ul>		
<ul> <li>Ensure a terminated registered grower agent can no longer gain access to the licensed premises.</li> </ul>		
<ol> <li>The Licensee commits to requiring a prospective grower agent to submit to a drug screen before commencement of association.</li> </ol>		
11. The following points relate to the drug screen:		
a. The Licensee commits to have the prospective grower agent's drug screen be carried out following the procedures set forth in COMAR 17.04.09.04—.08.		
<ul> <li>In addition to the drugs to be screened in accordance with COMAR 17.04.09.06, the screen shall include any other drugs as required by the Commission.</li> </ul>		
c. Unless medically justified, a prospective grower agent who has a positive response to any tested substance on a drug screen that meets the requirements of COMAR 17.04.09.07 may not be registered by the Commission.		
12. The Licensee commits to retaining training materials and training attendance records and make these available for inspection by the Commission.		
13. The Licensee commits to having each registered grower agent declare in writing that the registered grower agent will adhere to the State alcohol and drug free workplace policy, as identified in COMAR 21.11.08.03.		
14. The Licensee commits to retaining the declaration in a registered grower agent's personnel record.		
15. Every year, on a date determined by the Commission,		П



	censee commits to notifying the Commission that censee has verified that no registered grower agent	1	res (	No	
has be	een convicted of a felony drug offense.				
	nsee commits to locating the licensed premises Maryland.				
	ards to the location of the licensed premises, the see commits to the following:				
a.	The premises and operations of a Licensee shall conform to local zoning and planning requirements.				
b.	The grower license shall be conspicuously displayed at each licensed premises.				
c.	A Licensee shall notify the Commission of proposed major renovations or modifications to a licensed premi	ses.			
d.	No major renovation or modification shall be undertake without notification to the Commission.	en			
The undersigned attests that the Applicant organization will adhere to the statutory/regulatory requirements listed above and that they have the authority to bind the Applicant organization to the statutory requirements.					
Signature	Date				
Printed Name					



#### FORM 1

# AUTHORIZATION FOR RELEASE OF INFORMATION-INVESTOR/GROWER AGENT

Investor/Agent: Investor/Agent (Investor/Agent's Name)

I am an investor or an agent applying for a Medical Cannabis Choose an item. (Grower/Processor/Dispensary) License in the State of Maryland.

The Maryland Medical Cannabis Commission ("Commission") is required by law to conduct an investigation of an Applicant for a Medical Cannabis Dispensary License. That investigation requires the Commission to collect and evaluate information about me. I irrevocably give consent to the Commission, the Maryland State Police, and persons authorized by the Commission to: (1) verify all information provided in the license Application documents; (2) conduct a background investigation of me; and (3) to have access to any and all information that I have provided to any other jurisdiction seeking a similar license in that jurisdiction, as well as information obtained by that other jurisdiction during the course of any investigation that it may have conducted about me.

By executing this Authorization, I authorize any of the following entities to release to the Commission any and all information about me that the Commission requests: any local, State or Federal unit; any commercial or business enterprise; any non-profit entity; any individual; or any other public or private entity. The requested information may be released in written, verbal, electronic, or any other form.

With respect to any claims or liability arising from the release of the requested information to the Commission, I expressly waive, release, discharge and forever hold harmless and agree to indemnify, the unit, entity, or individual that releases the information to the Commission under the authority of this Authorization.

A photo, facsimile, or electronic copy of effective as an original.	f this signed and dated Authorization shall be equally as
Signature of Applicant	Date
Applicant Name Printed Name of Applicant	



		NOTARY	
		d for the County of, in the Si	
and before	me, either known to me or	that the above named individual appeared in persatisfactorily proved to be individual whose named signed the Authorization and Notification.	erson, ne
This and seal.	day of	, 20, and to which witness m	ıy hand
		Notary Public	
		Printed Name	
Stamp or Se	eal		
My Commis	ssion Expires:	. 20	



#### FORM 2

#### **AUTHORIZATION FOR RELEASE OF INFORMATION-BUSINESS ENTITY**

Business Entity Name: Business Entity Name

Name of Person Completing Form: Name of Person Completing Form

(Authorized Representative)

[Type text] is an Authorized Representative, empowered by the Business Entity to execute this form on its behalf.

[Type text] is an Applicant for a Medical Cannabis Choose an item. (Grower/Processor/Dispensary) License in the State of Maryland.

The Maryland Medical Cannabis Commission ("Commission") is required by law to conduct an investigation of an Applicant for a Medical Cannabis Dispensary License. That investigation requires the Commission to collect and evaluate information about the Business Entity. The Business Entity irrevocably gives its consent to the Commission, the Maryland State Police, and persons authorized by the Commission to: (1) verify all information provided in the license Application documents; (2) conduct a background investigation of the Business Entity; and (3) to have access to any and all information that the Business Entity has provided to any other jurisdiction seeking a similar license in that jurisdiction, as well as information obtained by that other jurisdiction during the course of any investigation that it may have conducted about the Business Entity.

By executing this Authorization, the Business Entity authorizes any of the following entities to release to the Commission any and all information about the Business Entity that the Commission requests: any local, State or Federal unit; any commercial or business enterprise; any non-profit entity; any individual; or any other public or private entity. The requested information may be released in written, verbal, electronic, or any other form.

With respect to any claims or liability arising from the release of the requested information to the Commission, the Business Entity expressly waives, releases, discharges and forever holds harmless and agrees to indemnify, the unit, entity, or individual that releases the information to the Commission under the authority of this Authorization.

A photo, facsimile, or electronic copy of this signed and dated Authorization shall be equally as effective as an original.

Date

W 500 W 200

Printed Name of Authorized Representative

Signature of Authorized Representative



Υ
unty of, in the State of
we named individual as an Authorized
, appeared in person, and before me,
idividual whose name subscribed to the
Notification.
The state of the s
, 20, and to which witness my hand
Notary Public
Printed Name
, 20



## FORM 3

#### **Trade Secret & Financial Data Notification**

[Type text] is an Applicant for a Medical Cannabis Choose an item. License. [Type text] understands that the Commission is an entity of the State of Maryland and any documents or data that is submitted to the State of Maryland may be disclosed by the State pursuant to a Maryland Public Information Act ("MPIA") Request.

While the MPIA permits certain exclusions from disclosure, [Type text] understands the State makes no guarantees or promises that such data will not be disclosed. [Type text] has reviewed the MPIA, as it is available online at <a href="http://www.lexisnexis.com/hottopics/mdcode">http://www.lexisnexis.com/hottopics/mdcode</a>. [Type text] understands that other helpful resources may be found at www.oag.state.md.us/Opengov.

$[Type\ text]$ understands that the documents or data it provides to the State of Maryland mannet be confidential, or if confidential, may or may not be disclosed pursuant to a MPIA requirement.		
Signature of Person or Authorized Representative	Date	
Printed Name		
Printed Name		



### FORM 4

## **Regulatory Agency Form**

# **BUSINESS INTEREST IDENTIFICATION & AUTHORIZATION FORM**

I/We, the undersigned Applicant, hereby state(s) as follows:

I/We have either applied for or are currently or have been previously licensed or authorized to produce or otherwise deal in the distribution of Cannabis in any form, in the following States or jurisdiction and corresponding agency or authority:

State & Name of Agency	Type of License	Name of License	License or Registration #
[Type text]	[Type text]	[Type text]	[Type text]
[Type text]	[Type text]	[Type text]	[Type text]
[Type text]	[Type text]	[Type text]	[Type text]
[Type text]	[Type text]	[Type text]	[Type text]

I/We hereby specifically grant the Maryland Department of Health & Mental Hygiene permission to contact the above listed States or jurisdiction and their licensing agency or authority to confirm the information contained in the Application for a dispensary license. I/We hereby specifically grant permission to the above listed States or jurisdiction and their licensing agency or authority to release to the Maryland Department of Health & Mental Hygiene any and all information relating to the Application, licensure or authorization to produce or otherwise deal in the distribution of Cannabis in any form, including the following:

- Any denial, suspension, revocation or other sanction of the Application, license or authorization; and
- b. A copy of documentation so indicating; or
- A statement that the Applicant was so licensed or authorized and was never sanctioned.

The undersigned attests that the Applicant organization will adhere to the statutory
requirements listed above and that they have the authority to bind the Applicant organizatio
to the statutory requirements.

Name- Signature	Date
Name- Printed	
Name- Printed	



# FORM 5

# Investors, Agents, Owners & Managing Director Certification Statement Form

1. I certify that any Cannabis business entity or its equivalent in which I hold or have held an interest, has not had the registration or license, suspended, revoked, placed on probationary status or subject to any disciplinary action. If no, provide an explanation.  [Type text]	Yes	No
2. I certify that no business or non-profit entity on whose board of directors I have served has been convicted of a crime, fined, censured or had any registration or authorization to do business revoked or suspended, or been the subject of an administrative or judicial proceedings challenging the entity's proper operation under law. If no, please explain and refer to case or news reports.	Yes	No
3. Are you a party to any legal proceeding where damages, fines, or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim? If yes, provide an explanation.  [Type text]	Yes	No □
<ol> <li>I certify that I am not delinquent on the filing of State or Federal taxes.</li> <li>If delinquent, provide an explanation.</li> </ol>	Yes	No
5. If you have held a medical Cannabis or medical marijuana license or registration in another State, have you been disciplined (including, but not limited to restricted, suspended, or terminate) by any State? If yes, provide a brief explanation.  [Type text]	Yes	No
6. I certify that I have not been denied a professional license, privilege of taking an examination, or had a professional license or permit disciplined by a licensing authority in Maryland or other State. If no, provide a brief explanation.  [Type text]	Yes □	No



7. Are you employed by the State of Maryland? If no, skip next question.	Yes □	No
8. If you are employed by the State, please state the name, agency and position.		
[Type text]		m
9. I acknowledge that I fully understand that:	Yes	No
Cannabis is a Schedule I controlled substance under the Controlled		
Substances Act of 1970 (21 U.S.C. 801 et seq.);		W W W W W W W W W W W W W W W W W W W
Manufacture, distribution, cultivation, processing, possession, or possession with intent to distribute a Schedule I controlled substance, or conspiring or attempting to do so, are offenses subject to harsh penalties under federal law and could result in arrest, prosecution, conviction, incarceration, fine, seizure of property, and loss of licenses or other privileges; and		g
Any activity regarding cannabis that does not comply with Maryland law or regulations is a violation of State law and could result in arrest, prosecution, conviction, incarceration, fine, seizure of property, and loss of licenses or other privileges.		
10. I certify that I have not been charged with or have been convicted of a	Yes	No
felony offense which is reflective of an absence of good moral character.		
11. I certify my acknowledgement that Application Fees are non- refundable.	Yes	No
<ul> <li>12. I acknowledge that in filing an Application for a license and receiving a date and time stamped receipt, the following:</li> <li>a. The Commission is vested with broad discretion to select the Applicants to be awarded a License; and</li> <li>b. The Commission's decisions in selecting the Applicants shall be final.</li> </ul>	Yes □	No



Dated thisday of	, 20
e ·	
Signature of Owner/ Managing Director	Owner/Managing Director Printed Name of Owner/ Managing Director
Sworn to and subscribed before me on this	day of 20
(SEAL)	Notary Public

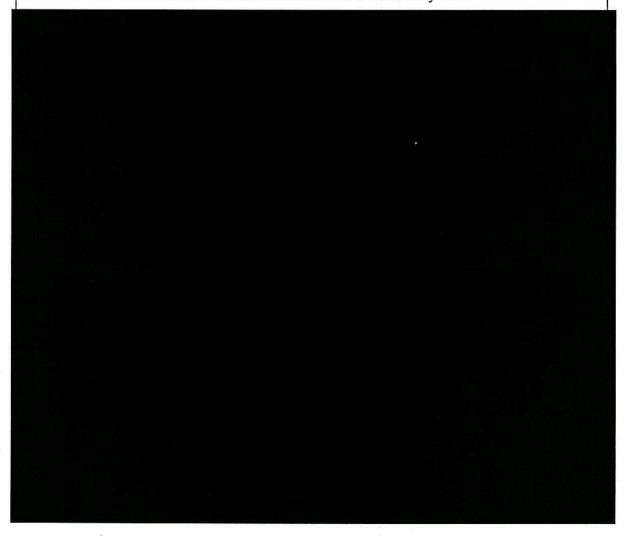


#### 10.62.08.05

1. Please provide a biography for the Applicant including the experience, knowledge and training in (a) horticultural production and (b) agricultural production. \*

[Reference 10.62.08.05 of the regulations. Graded 0 to 5 scoring. Weighted 70% of the Commercial Horticulture or Agriculture subsection. Maximum length 2,250 words]

The Applicant has assembled a team with an unparalleled breadth of applicable experience, knowledge, and training in horticultural and agricultural production. Together, our growers have over 50 years of experience in large-scale food, herb, and flower production and over 5 years of medical cannabis cultivation experience, with particular expertise in cultivating strains that are high in cannabidiol (CBD) and that have proven successful in reducing seizure activity in children suffering from pediatric epilepsy. In addition, we bring expertise in other areas pertinent to successful horticultural and agricultural production, including facility design and construction, management and operations, innovation, and regulation and compliance, which we believe positions us to succeed in the cultivation of medical cannabis in Maryland.



### DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



The 240,000 square foot greenhouse facility produces a wide variety of flowers, vegetables, and herbs, which underscores John and Travis's large-scale horticultural experience. Annual production includes:

- 720,000 bedding plants
- 250,000 geraniums
- 100,000 new guinea impatiens
- 25,000 hanging baskets
- 50,000 herbs
- 200,000 vegetable pots
- 4,000 container gardens
- 500,000 ground covers
- 500 poinsettia trees
- 50,000 poinsettia pots
- 10,000 cyclamens
- · 1,000,000 specialty annuals

John and Travis also have 22 years of experience working on their 500-acre corn and soybean farm, including mowing buffer zones, planting crops, maintaining equipment, and harvesting. The farm is enrolled in the Maryland Cover Crop Program, which increases organic matter in the soil, reduces weeds and pests, and provides a habitat for beneficial insects. The production of the farm displays their large-scale agricultural experience. Annual yields include 20,250 bushels of corn and 75,000 bushels of soybeans.

John and Travis bring decades of large-scale horticultural and agricultural production to the Applicant team. This expertise, particularly greenhouse cultivation experience, will enable us to scale production efficiently and effectively to meet demand for medical cannabis in Maryland.

#### **Medical Cannabis Cultivation**

One member of the Applicant team currently owns and operates a 15,000 square foot indoor cultivation facility in Arizona. Gareld Eaton, that facility's Director of Cultivation, will be employed in Maryland to implement best practices for indoor and greenhouse medical cannabis cultivation. Gareld's agricultural and horticultural education began in the 1970s at Northern Arizona University, where he graduated with Bachelor's degrees in Biology and Botany and supervised and operated all campus greenhouses. Since then he has accumulated decades of horticultural and agricultural experience and served for two years on Project CENTRL, a rural agriculture leadership training program. Recently, he received a certificate for greenhouse plant physiology and technology from the University of Arizona and a certificate for nutrient management for container-grown crops from the University of Florida.

Gareld began growing medical cannabis after the passage of the Arizona Medical Marijuana Act in 2010, and has been employed at the indoor facility since 2013. There, he supervises all phases of cultivation. Gareld's efforts have earned wide recognition: in 2014 one of his strains was named best in Arizona. Gareld is also responsible for developing ten high-CBD strains, with CBD to THC ratios ranging from 25:1 to 1:2, several of which have been instrumental in successfully reducing seizure activity in over 50 children suffering from pediatric epilepsy as

## DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



part of the Applicant's 501(c)(3) non-profit organization.

John, Travis, and Gareld complement one another. Together, they form a team that has the experience, knowledge, and training to successfully produce safe, high-quality medical cannabis for Maryland patients.

## **Design and Construction**

Facility design and construction is paramount for successful agricultural and horticultural production. Matt Waltz and Paul Nowak, the Applicant's design and construction team, have 43 years of combined experience, almost 10 years of which is specific to the medical cannabis industry. To date, they have designed and constructed cultivation, processing, and dispensary facilities in Arizona, Nevada, and Illinois.

Their areas of expertise include layout direction and floorplan development to increase efficiency and reduce contamination, space and equipment planning, and facility security. Matt and Paul integrate LEED practices such as green building, water conservation, air quality control, and energy efficiency into medical cannabis cultivation facilities, and their zero-waste design employs automated fertigation and irrigation systems.

Both Matt and Paul hold Bachelor's degrees in Construction Management and Engineering from Arizona State University. Matt is LEED Accredited and is a member of the International Society of Pharmaceutical Engineers. Together, their cannabis-related design and construction experience includes:

- A 15,000 square foot cultivation and pharmaceutical-grade extraction and refinement facility in Flagstaff, AZ, which includes cGMP quality fill finish and packaging
- Two cultivation/processing facilities in Nevada, one 15,000 square feet and the other 20,000 square feet
- A 46,000 square foot cultivation facility in Illinois
- An in-development 32,000 square foot fully-automated commercial greenhouse, including integrated environmental controls, security, restricted access systems, and an automated zero-waste fertigation and irrigation system
- A retail dispensary in Tempe, AZ designed to serve up to 500 patients daily, which
  incorporates a high-tech security system with components similar to bank central vault
  protocols and hardware
- Design and consultation services for two retail dispensaries in Nevada

#### Facility Management and Operations

Brett Sorauf will serve as the Cultivation Manager for the Maryland facility. He has over three years of management experience and has served for one year as Cultivation Manager at the indoor cultivation facility in Arizona. There, Brett's responsibilities include:

- Supervising cultivation facility staff members
- · Creating cloning, harvesting, watering, treatment, and curing schedules
- · Ensuring cleanliness in the facility to reduce the risk of plant infections
- Conducting weekly meetings across all departments



 Maintaining equipment and water filtration systems (e.g., fog treatment cart, drain pumps, watering lines and hoses, humidity control units, and light fixtures)

Brett has also implemented procedures to improve facility operations, including:

- Analyzing space requirements and plant numbers to make efficient use of growing space
- Implementing an integrated pest management system using organic fungicides and pesticides
- Analyzing the cultivation processes to remove unneeded steps and improve efficiency
- Supervising construction projects to ensure efficient use of available growing space
- · Creating a perpetual cultivation cycle
- Reducing the steps required to care for plants to reduce plant stress
- Developing detailed policies and procedures, including preparation for forthcoming Americans for Safe Access audit
- Supervising the addition of water filtrations systems, soil media, benching systems, climate control units, fertigation systems, and CO<sub>2</sub> generators

#### Innovation

#### Academic Partnerships

We believe it is important to establish relationships with experts to ensure cultivation methods remain current. To this end, we have established a nearly three-year-long relationship with faculty of the Agriculture Technology program at Yavapai College to assist with operations at our existing indoor facility. Faculty members have lent expertise regarding water availability, greenhouse orientation, prevailing wind, fertigation and control systems, and building and benching layout. Other areas in which they have expertise include:

- · Design, operation, and management of extensive agricultural facilities
- Disease and water quality management systems
- Plant propagation
- · Development and implementation of integrated pest management systems

The faculty of Yavapai College will consult on the development and operation of the proposed cultivation facility. Additionally, we will seek similar relationships with Maryland institutions. We have initiated discussions with Dominick Murray, State Secretary of Business and Economic Development, who has agreed to introduce our organization to faculty at the School of Agricultural and Natural Sciences at the University of Maryland Eastern Shore.

### Director of Innovation

Innovation should be driven not only by science, but also by the existing market. The Applicant recently hired Paresh Patel to serve as the Director of Innovation for cultivation and processing, and he will serve in a similar role at the proposed cultivation facility. Paresh holds a Bachelor's degree in Chemical Engineering and an M.B.A. from Carnegie Mellon University. He has extensive experience in the pharmaceutical industry, and was previously employed at Merck, W&H Research and Consulting, LifeCell Corporation, Novo Nordisk, and Sunovion, where his



responsibilities included research and development, supervision and execution of clinical trials, and product launch.

At the proposed facility, Paresh will apply his expertise to increase cultivation efficiency and study the Maryland medical cannabis market to understand the strains and cannabinoid profiles that Maryland patients find most effective. Using this information, he will collaborate with the Cultivation Manager to determine potential methods for producing strains that exhibit desired characteristics and conduct extensive experimental research to distinguish effective and ineffective techniques.

## Regulation and Compliance

One of the Applicant members, Steve White, will serve as the regulatory expert and consult on all regulation and compliance-related issues. In contrast to other horticultural and agricultural endeavors, successful cannabis cultivation requires adherence to strict regulatory promulgations, and navigating this governance necessitates experienced and knowledgeable direction.

Steve graduated from Washington & Lee School of Law in 1999. After, he moved to Arizona where he practiced in front of regulatory boards and advised numerous clients on federal and state regulatory issues. When the Arizona Medical Marijuana Act (AMMA) passed in 2010, Steve developed compliant operational policies and procedures for clients and represented parties in zoning and variance hearings. He also initiated litigation with the Arizona Department of Health Services (ADHS) over inadequate medical cannabis regulations, permitting the ADHS to re-initiate the rulemaking process. When one Arizona municipality impermissibly banned medical cannabis businesses, Steve represented a licensee within that jurisdiction, winning at the trial court level and causing the municipality to amend its zoning ordinance.

Steve has been instrumental in navigating state- and county-level regulatory audits, including three Coconino County building safety certificate of occupancy inspections, two Coconino County health department inspections, three Arizona State department of health services inspections, as wells as a forthcoming Americans for Safe Access Patient Focused Certification inspection and dozens of internal audits.

#### Agriculture and Horticulture in Hancock, Maryland

The proposed cultivation facility will be located in Hancock, Maryland. Hancock has a long history of agriculture and horticulture. Orchards were first planted in the late 1800s, and by 1925 over 5,000 acres of apple, peach, and other fruit trees grew in the Hancock area. During this time, Hancock was known as the Fruit Growing Capital of the World, and the United States Bureau of Agriculture stated that the "...climate, soil, altitude, rainfall, drainage, sunlight and humus of the surrounding territory is pronounced by experts to be the best combination in the world." The orchards employed many Hancock residents and were a source of economic prosperity for the town. Unfortunately, legal issues and labor disputes rocked the industry in the 1970s, and many growers closed their orchards. The effects of these closures rippled throughout Hancock, resulting in mass unemployment. At one time, over 300 workers lost their jobs in a 30-day period.



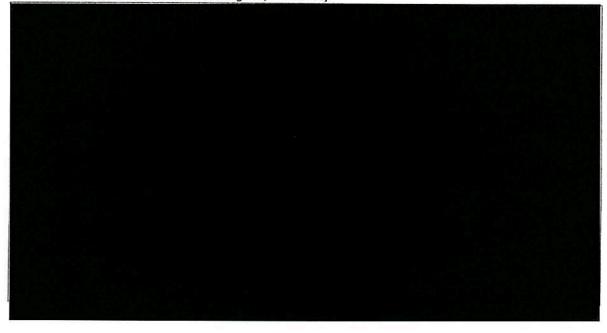
The Town has never recovered. To this day it remains economically depressed, and the Town's residents need an opportunity. We believe the proposed cultivation facility is that opportunity. Terry Baker, President of the Washington County Board of Commissioners, agrees, and the Board supports Hancock's relationship with the Applicant to bring new jobs to the town. Mayor Dan Murphy has publicly declared his support, stating "We feel this [the cultivation facility] is nothing but positive down the road for our town," and Delegate Mike McKay has provided full supports for the proposal. Councilman Homer Schetrompf, along with the rest of the Town Council, is aligned with Mayor Murphy and Delegate McKay, and has said that the facility could be a "lifeline" that saves the town.

Reflecting the importance of this opportunity, the Town Council unanimously agreed to lease the Applicant the town-owned warehouse facility and accepted a non-capital-contributing equity position in the company, establishing an unprecedented public-private partnership. Not only will this relationship provide much-needed income for the town, but never before has there been greater alignment between a local community and a medical cannabis operator.

In addition to this support, dozens of residents from former agricultural families have already submitted resumes and applications for positions within the facility. This enthusiasm and experience, within an ideal setting for cultivation, provides the ingredients for successful agricultural and horticultural production and has the potential to provide relief for a town struggling to recover from economic depression.

2. Please provide an executive summary of a business plan that demonstrates the likelihood of success, a sufficient business ability and experience on the part of the Applicant. In the executive summary of the business plan the Applicant should also explain the employee working conditions, benefits and training. \*

[Reference 10.62.08.05 of the regulations. Graded 0 to 5 scoring. Weighted 25% of the Business and Economic subsection. Maximum length 3,940 words]



## **DHMH-Maryland Medical Cannabis Commission**

Application for Medical Cannabis Grower License



skills in horticultural/agricultural production, design and construction, scientific and market research, management, and community outreach, and our track record speaks for itself: we own and operate award-winning cannabis dispensary, processing, and cultivation facilities in Arizona, Nevada, and Illinois

cultivation facilities in Arizona, Nevada, and Illinois

We formed a first-of-its-kind public-private partnership with the Town of Hancock, the
location of the proposed cultivation facility. Hancock has been economically deprived
since the 1970s, and State Delegate McKay, Mayor Murphy, the Town Council, and local
residents have expressed overwhelming support for the project, as it has the potential to
create over 120 new jobs and reverse years of economic depression

We believe this combination of experience, capitalization, and local support positions us to succeed in the cultivation of medical cannabis in Maryland.

### **Business Ability and Experience**

The Applicant team consists of three groups: Harvest, Inc.; the Town of Hancock; and members of the Radebaugh family. We originate from diverse backgrounds, all of which are required for successful cannabis cultivation:

- Horticultural and Agricultural Production
- Design and Construction
- Scientific and Market Research and Development
- Management and Operations
- Innovation
- Regulation and Compliance
- Charitable Activities and Community Outreach

#### Organizational Structure

#### Facility Staff

- Cultivation Manager Brett Sorauf
  - Director of Cultivation Gareld Eaton
    - Propagation Manager John/Travis Radebaugh
    - Vegetative Manager John/Travis Radebaugh
    - Flowering Manager John/Travis Radebaugh
    - Flower Preparation Manager John/Travis Radebaugh
  - Facilities Manager Paul Nowak
  - Marketing Manager Paresh Patel
  - Inventory Manager
  - Packaging and Transportation Manager
  - o Human Resources Manager
  - Security Manager
  - Accounting Manager



### **Advisory Board**

Steve White, JD - CEO, Harvest, Inc., regulation and compliance Dr. William Troutt - Medical Director, Harvest, Inc., medical research Dr. Matthew DiDonato - Marketing Director, Harvest, Inc., market research Matthew Waltz - Design/Construction, Harvest, Inc., design/construction Jessica Crozier - Parent Liaison, Harvesting Hope, community outreach David Grandon - Outreach Coordinator, Harvest, Inc., community outreach Chief Buskirk - Chief of Hancock Police Department, safety and security

### Horticultural and Agricultural Production

### General Horticulture and Agriculture

John and Travis Radebaugh represent the third and fourth generations of a family with nearly 100 years of agricultural and horticultural experience in Maryland. They own 1000 acres throughout Maryland, including a 240,000 square foot greenhouse facility and a 500-acre farm. John has over 35 years of horticultural and agricultural experience, particularly in cutting propagation, fertilization, irrigation, temperature/lighting control, pest management, production, and facility management. Travis holds a Bachelor's degree in Environmental Science from Washington College, has over 15 years of horticultural experience, and since 2008 has acted as manager of the greenhouse facility. The greenhouses produce a wide variety of flowers, vegetables, and herbs, including geraniums, hanging baskets, herbs, vegetable pots, and poinsettias, which underscores John and Travis's large-scale horticultural experience.

#### Medical Cannabis Cultivation

Harvest, Inc. currently owns and operates a 15,000 square foot indoor cultivation facility in Arizona. Gareld Eaton, that facility's Director of Cultivation, will be employed in Maryland to implement best practices for indoor and greenhouse medical cannabis cultivation. Gareld's agricultural and horticultural education began in the 1970s at Northern Arizona University, where he graduated with Bachelor's degrees in Biology and Botany and supervised and operated all campus greenhouses. Since then he has accumulated decades of horticultural and agricultural experience and served for two years on Project CENTRL, a rural agriculture leadership training program. Recently, he received a certificate for greenhouse plant physiology and technology from the University of Arizona and a certificate for nutrient management for container-grown crops from the University of Florida.

Gareld began growing medical cannabis after the passage of the Arizona Medical Marijuana Act in 2010, and has been employed at the indoor facility since 2013. There, he supervises all phases of cultivation. Gareld's efforts have earned wide recognition: in 2014 one of his strains was named best in Arizona. Gareld is also responsible for developing ten high-CBD strains, with CBD to THC ratios ranging from 25:1 to 1:2, several of which have been instrumental in successfully reducing seizure activity in over 50 children suffering from pediatric epilepsy as part of the Applicant's 501(c)(3) non-profit organization.

#### **Design and Construction**



Facility design and construction is paramount for successful agricultural and horticultural production. Matthew Waltz and Paul Nowak have 43 years of combined experience, specializing in pharmaceutical and biotechnology facilities, including the Human Genome Sciences Campus in Rockville, Maryland. Almost 10 years of their experience is specific to medical cannabis. Paul will serve as the Facilities Manager at the proposed facility. Both hold Bachelor's degrees in Construction Management and Engineering from Arizona State University. Matthew and Paul integrate LEED practices such as green building, water conservation, air quality control, and energy efficiency into medical cannabis cultivation facilities, and their zero-waste design employs automated fertigation and irrigation systems.

Together, their cannabis cultivation-related design/construction experience includes:

- A 15,000 square foot, cultivation and pharmaceutical-grade extraction facility in Flagstaff, AZ, which which includes cGMP quality fill finish and packaging
- Two cultivation/processing facilities in Nevada, one 15,000 square feet and the other 20,000 square feet
- · A 46,000 square foot cultivation facility in Illinois
- An in development 32,000 square foot commercial greenhouse that includes integrated environmental controls and an automated, zero-waste fertigation and irrigation system

In addition, Matthew and Paul have extensive experience designing and implementing security systems for medical cannabis establishments, including surveillance and alarm systems, barriers to entry, and backup power supplies. Chief Buskirk will also be consulted on the implementation of further security measures.

### **Management and Operations**

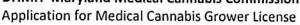
Brett Sorauf will serve as the Cultivation Manager for the Maryland facility. He has over three years of management experience and has served for one year as Cultivation Manager for Harvest, Inc. Brett has assisted in the development of our Operations Manual and employee training materials, and he supervises and provides training for cultivation facility staff. Brett has also implemented procedures to improve facility operations, including:

- Analyzing space requirements and plant numbers to make efficient use of growing space
- Implementing an integrated pest management system
- · Analyzing cultivation processes, removing unneeded steps to improve efficiency
- Supervising construction projects
- Creating a perpetual cultivation cycle
- Reducing the steps required to care for plants, reducing plant stress
- Developing detailed policies and procedures, including preparation for forthcoming Americans for Safe Access audit to earn a Patient Focused Certification
- Supervising the addition of water filtrations systems, soil media, benching systems, climate control units, fertigation systems, and CO<sub>2</sub> generators

### Regulation and Compliance

Steve White will advise on all regulation and compliance-related efforts. Steve graduated from Washington & Lee School of Law in 1999. After, he practiced in front of various regulatory

# DHMH-Maryland Medical Cannabis Commission





boards and advised numerous clients on federal and state regulatory issues. His medical cannabis-specific experience includes:

- Developing compliant operational policies and procedures for clients
- Represented parties in zoning and variance hearings
- Initiating litigation with the Arizona Department of Health Services (ADHS) over inadequate regulations pursuant to the Arizona Medical Marijuana Act (AMMA)
- Representing an impermissibly banned licensee, winning at the trial court level and causing the municipality to amend its zoning ordinance
- · Navigating state- and county-level regulatory audits, including:
  - o Three county building safety certificate of occupancy inspections
  - Two county health department inspections
  - Three state department of health services inspections
  - o Americans for Safe Access Patient Focused Certification inspections

### Scientific and Market Research and Development

The Applicant's scientific and market research team is led by Dr. William Troutt, Dr. Matthew DiDonato, and Paresh Patel.

Dr. Troutt graduated from the Southwest College of Naturopathic Medicine, specializing in botanical and natural medicines. He has worked exclusively in the cannabis field since the passage of the AMMA in 2010, and has consulted with thousands of patients and dozens of medical professionals, enabling him to provide perspective on patient's needs. He is knowledgeable in all phases of medical cannabis cultivation, is uniquely trained in the preparation and use of botanical medicines, and has developed a line of wholly medical cannabis products, Pure Cannabis Products.

Dr. DiDonato holds a PhD in Family and Human Development from Arizona State University, with an emphasis in Quantitative Methods, and has served as Harvest, Inc.'s Director of Marketing since 2013. He has implemented an extensive research program to analyze the medical cannabis market, surveying thousands of patients on the effectiveness of various cannabinoid profiles for the treatment of specific conditions, information which was used to cultivate medical cannabis strains that provide the greatest therapeutic impact.

Together, Drs. Troutt and DiDonato founded the Medical Marijuana Research Institute, an organization that conducts and publishes original research on the therapeutic effects of medical cannabis. The Institute's first article, published in the *Journal of Psychoactive Drugs*, examined the characteristics and perceptions of medical cannabis patients in Arizona, specifically, the effectiveness of cannabis for treating various conditions.

Paresh Patel will lead all market research efforts at the cultivation facility. Paresh attended Carnegie Mellon University, earning Bachelor's degrees in Chemical and Biomedical Engineering and an M.B.A. He has extensive experience in the pharmaceutical industry, and was previously employed at Merck, W&H Research and Consulting, LifeCell Corporation, Novo Nordisk, and Sunovion Pharmaceuticals. At the proposed facility, Paresh will quantify the Maryland medical cannabis market to understand the cannabis strains and cannabinoid profiles



Maryland patients find most effective. Using this information, he will collaborate with the Cultivation Manager to determine potential methods for producing strains that exhibit desired characteristics and conduct extensive experimental research to distinguish effective and ineffective techniques.

### Innovation

We believe it is important to establish relationships with experts to ensure cultivation methods remain current. We have established a nearly three-year-long relationship with the Agricultural Technology program at Yavapai College to assist with operations at our existing facility. The faculty have lent their expertise regarding water availability, greenhouse orientation, prevailing wind, fertigation and control systems, and building and benching layout. Other areas in which they have expertise include:

- Designing, operating, and management of extensive agricultural facilities
- Disease and water quality management systems
- · Plant propagation from cuttings and seeds
- Developing and implementing integrated pest management systems

We will utilize the faculty as consultants on the development and operation of the proposed facility. Additionally, we will seek similar relationships with Maryland institutions. We have initiated discussions with Dominick Murray, State Secretary of Business and Economic Development, who has agreed to introduce our organization to faculty at the School of Agricultural and Natural Sciences at the University of Maryland Eastern Shore.

### **Charitable Activities and Community Outreach**

A fundamental goal of our business is to have a positive impact on the surrounding community:

- To date, we have donated over \$200,000 to local charitable organizations (Justa Center, Arizona Epilepsy Foundation, Climb to Conquer Cancer), Veterans, Seniors, and patients in need
- We employ an Outreach Coordinator, David Grandon, to organize support groups (pediatric epilepsy, chronic pain, multiple selerosis), arrange access to medical professionals, and establish relationships with local community organizations, such as the Arizona Epilepsy Foundation
- In Arizona, we established a 501(c)(3) non-profit organization, Harvesting Hope, that
  provides support for families with children suffering from pediatric seizure disorders. To
  date, we have positively affected the lives of over 50 children and their families

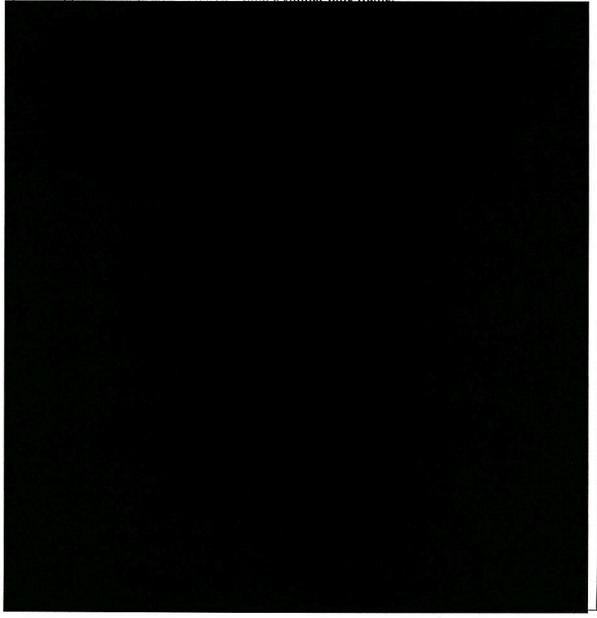
We believe an integral part of doing business within this industry necessitates having a positive community impact. Jessica Crozier, who serves as parent liaison for Harvesting Hope, will advise on the establishment of a Maryland branch of Harvesting Hope and build relationships with affected families within the community. David Grandon will advise on patient outreach, education, and charitable giving.

Market Projections, Planned Development, and Capitalization

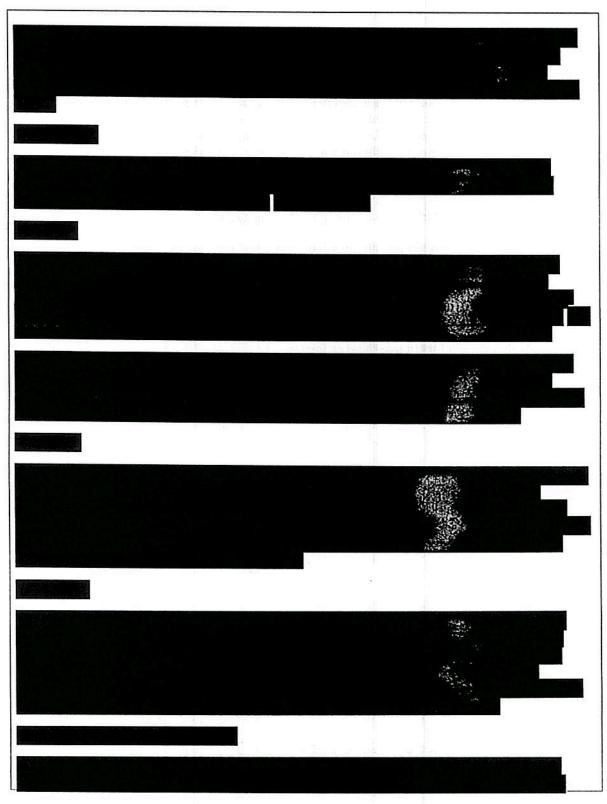


Leveraging data from Colorado and Arizona, we created a model to predict medical cannabis demand in Maryland.

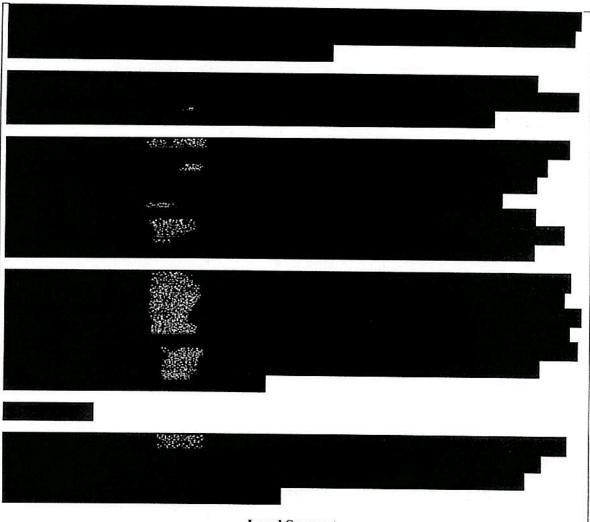
Colorado and Arizona are applicable comparison states as they share similar qualifying conditions as Maryland. Colorado is a mature market and has reached saturation: the number of medical cannabis patients has remained consistent for approximately two years. At saturation, patients comprise approximately 2.2% of the state population, and it took approximately five years to reach saturation. Arizona, although not as ma ture, is considered to be a market very similar to Maryland and is following a similar pattern of growth. At its current rate it should reach approximately 2% saturation within a similar time frame.











### Local Support

The Town of Hancock, the location of the proposed facility, has accepted an equity position in the application, a first-of-its kind arrangement, which makes the entire Town of over 1,500 residents an investor in the operation. Hancock is considered a depressed community with high unemployment, and owns a facility for the purpose of creating jobs in the community. This facility, however, currently sits empty. The proposed facility would occupy that building and provide an opportunity for economic growth. Terry Baker, President of the Washington County Board of Commissioners, agrees, and the Board supports the proposal. Town Mayor Dan Murphy has publicly declared his support, stating "We feel this [the cultivation facility] is nothing but positive down the road for our town," and Maryland Delegate Mike McKay called the facility a potential "game-changer." He has supported this application over others applying in his district. Councilman Homer Schetrompf, along with the rest of the Town Council, is aligned with Mayor Murphy and Delegate McKay, and has said that Hancock "needs a shot" in terms of new jobs and that the facility could be a "lifeline" that saves the Town.

The Town provides a motivated workforce and a streamlined approval process. The Applicant

## DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



has agreed to lease terms with Hancock on the facility, which also has land available for greenhouse construction, with the option to purchase the land and buildings. The proposed facility will ultimately provide Hancock and the surrounding communities with \$19 million in construction improvements, a \$3,000,000 annual labor investment, and 124 jobs to an area that desperately needs it. The Applicant has agreed to give preference to potential employees living within ten miles of the facility and further emphasize hiring women, who have been hit hardest by the recent loss of more than 1,000 jobs in Hancock.

### **Employee Working Conditions, Benefits, and Training**

### **Employee Working Conditions**

The Applicant's existing facilities are kept clean and free of known dangers, and the company's policies and procedures ensure employee safety and health. Approximately 20% of the positions at the proposed facility will pay wages above the average household income for Hancock. Currently, many residents must travel large distances for employment. The proposed facility will provide employment opportunities closer to home, saving time and money.

The existing facility contains an employee cafeteria, which will be renovated to serve healthy meals at breakfast and lunch, below cost, to encourage employees to remain at the facility. Further, the facility will have space dedicated for child care. Lastly, we will implement an employee wellness program, which will include nutritional consultation and reimbursement for exercise-related expenses.

### **Employee Benefits**



#### Training for Productivity

The Applicant has developed an extensive employee training program over multiple years of successful operations, which includes initial, ongoing, and annual training. Initial training is provided by the Cultivation Manager, and focuses on standard operating procedures, proper methods of cultivation, safety and security, regulation and compliance, and the medical uses of cannabis. Chief Buskirk will also supplement training on safety and security. Ongoing training occurs in the form of weekly staff meetings, organized by the Cultivation Manager, to discuss how to improve cultivation practices and techniques, ensure employees are aware of all company policies and operating procedures, and stay current on any changes in the Commission's medical cannabis program. Finally, annual training will reiterate and update information presented during initial training.

This extensive training program has paid dividends for our existing operations. Our organization was the first in Arizona to receive the Americans for Safe Access Patient Focused Certification,

## **DHMH-Maryland Medical Cannabis Commission**

Application for Medical Cannabis Grower License



and one of only fifteen in the country. This year, The Applicant will receive three additional Patient Focused Certifications, one each for cultivation, dispensary, and processing. In addition, three different independent organizations and publications have presented our flagship dispensary with Best Dispensary awards.

### Conclusion

The Applicant currently holds interest in 29 medical cannabis enterprises across three states (counting vertically integrated licenses in Arizona as three separate licenses), presently operates nearly half of those enterprises, and has interest in more than 1,000 acres of active horticultural and agricultural property throughout Maryland. We can demonstrate operational experience in each legal activity proposed in this application -- indoor cannabis cultivation, greenhouse cultivation, and Maryland-specific agricultural and horticultural production. In Maryland, the Applicant is well capitalized and uniquely aligned with the municipality in which it plans to locate, which will facilitate a rapid design and construction process. Our extensive experience in highly regulated markets ensures that operations will be successful and professional. Finally, the partnership between the Applicant and the Town of Hancock is a first-of-its-kind arrangement that provides an opportunity to extricate the Town, the surrounding communities, and its residents from their long economic depression.

3. Please certify adequate capitalization and attach relevant documentation. \*

[Reference 10.62.08.05 of the regulations. Graded 0 to 5 scoring. Weighted 25% of the Business and Economic subsection. Maximum length 8.75 pages]

Please see Addendum A for demonstration of adequate capitalization.

4. Please certify residency for owners and investors in the State of Maryland and attach relevant documentation. \*

[Reference 10.62.08.05 of the regulations. Graded yes/no. Weighted 20% of the Additional Factors subsection. Maximum length 1 page]

Please see Addendum B for certification of residency.

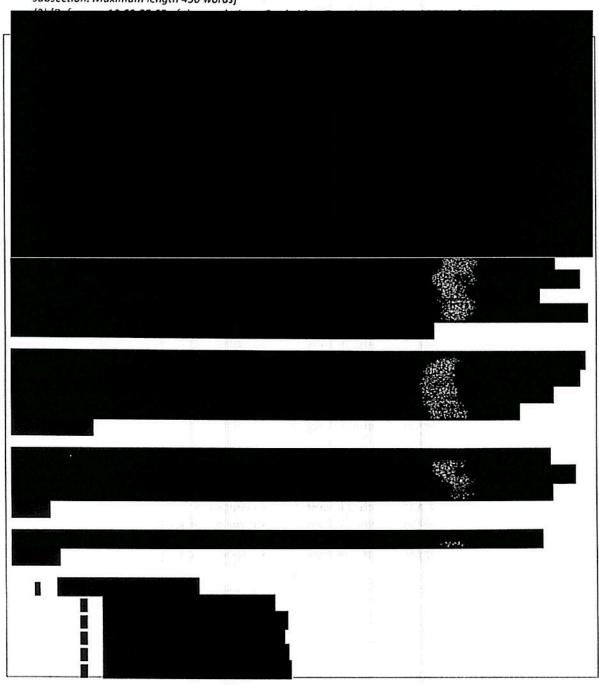
5. Please certify that the Applicant is not in arrears regarding any tax obligation in Maryland and other jurisdictions and attach relevant documentation. \*

[Reference 10.62.08.05 of the regulations. Graded yes/no. Weighted 40% of the Additional Factors subsection. Maximum length 2.25 pages]

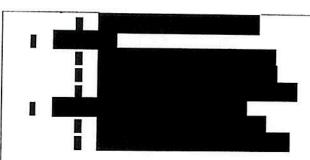
Please see Addendum C for relevant documentation regarding tax obligations.



- 6. Please provide a list of proposed medical cannabis varieties proposed to be grown with cannabinoid profiles including: (1) varieties with high cannabidiol content; (2) whether the strain has any demonstrated success in alleviating symptoms of specific diseases or conditions. \*
  - (1) [Reference 10.62.08.05 of the regulations. Graded 0 to 5 scoring. Weighted 20% of the Additional Factors subsection. Maximum length 450 words]

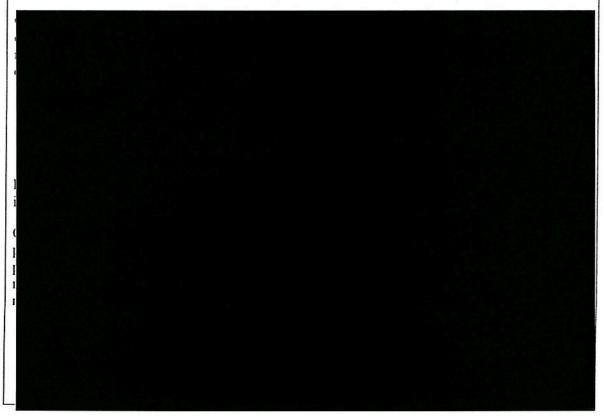






In addition to the research conducted on cannabinoid profiles, we also examined plant production and found that these strains yielded up to 50% more usable cannabis than others. This capacity makes these strains more desirable than others that express similar cannabinoid profiles, as greater production equates to lower costs, which allows patients to purchase more medical cannabis to treat their conditions.

(2) After conducting research to identify cannabinoid profiles that would most benefit our patients, we launched an evaluation phase comprised of formal and informal research to determine the effectiveness of the cultivated cannabis for treating various conditions. Our formal research, published in the *Journal of Psychoactive Drugs*, showed that patients perceive cannabis to be generally effective for treating a large number of conditions, most commonly chronic pain, muscle spasms, nausea, anxiety, arthritis, depression, headaches, insomnia, and stress.







#### 10.62.09.07

7. Please explain how the Applicant would train all registered grower agents on Federal and State medical cannabis laws and regulations, as well as other laws and regulations pertinent to the grower agent's responsibilities. \*

[Reference 10.62.09.07 of the regulations. Graded yes/no. Weighted 12.5% of business and economic subsection. Maximum length 1,575 words]

The Applicant is committed to providing employees with training and up-to-date information that will help them better understand the legal and regulatory issues surrounding the cultivation of medical cannabis. The Applicant has nearly three years of experience operating cultivation facilities in Arizona, which includes extensive employee training procedures related to cultivation laws and regulations.

#### Instruction

The Cultivation Manager directs the employee training program, which includes training on Federal and State cannabis laws and regulations. This training is conducted by the Chief Executive Officer (CEO), Steve White, who has decades of legal, regulatory, and compliance-related experience, several years of which is medical cannabis-specific. He has been instrumental in navigating state- and county-level regulatory audits at our existing cultivation facilities, including:

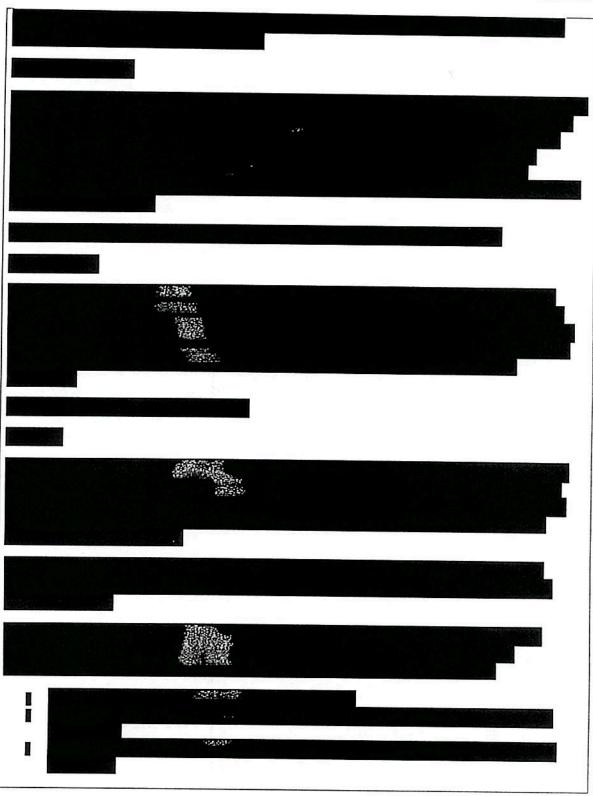
- Three county building safety certificate of occupancy inspections
- Two county health department inspections
- Three state department of health services inspections
- A forthcoming Americans for Safe Access Patient Focused Certification inspection

He will apply this expertise in training employees at the Maryland cultivation facility.

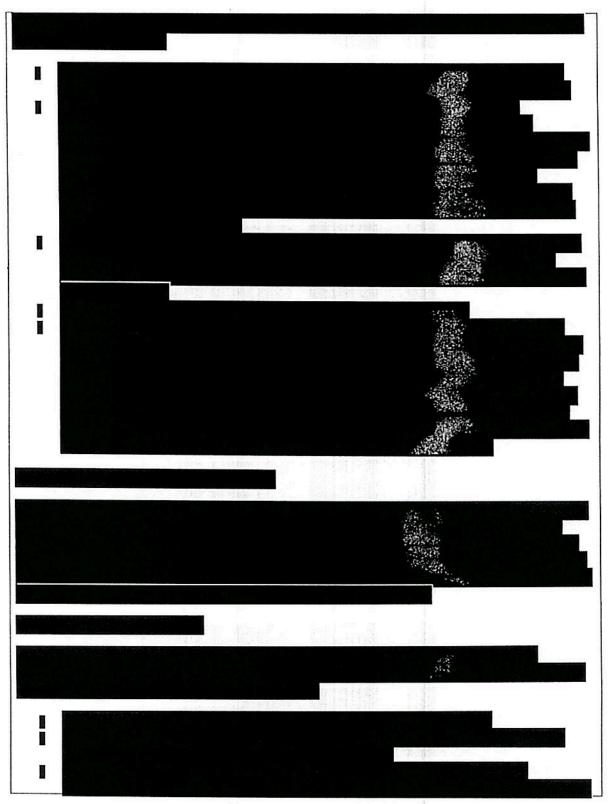
#### **Training Curriculum**



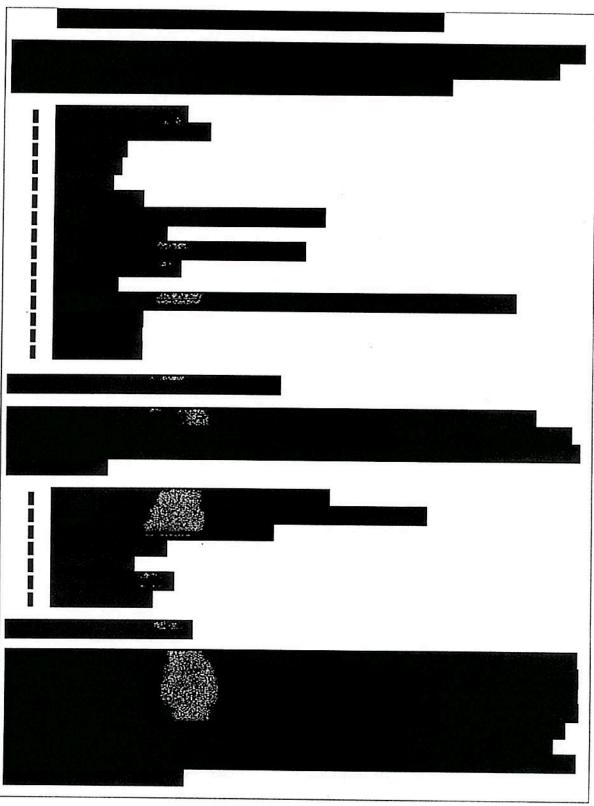














### Weekly Staff Meetings

Employees are also required to attend weekly staff meetings held by the Cultivation Manager or department manager, with assistance from the CEO, as necessary. Two of the primary purposes of the staff meetings are to 1) stay current on any changes in the State's medical cannabis program and 2) stay current on Federal laws and regulations that pertain to medical cannabis. In our existing facilities we have had success motivating employees to remain current on laws and regulations through the use of pop quizzes and monetary rewards for prepared employees, and will continue this practice in Maryland to ensure full compliance with the Commission.

# 8. Please explain how the Applicant would train all registered grower agents on standard operating procedures and provide a summary of the training. \*

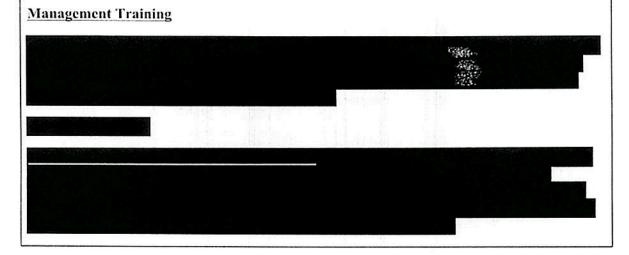
[Reference 10.62.09.07 of the regulations. Graded 0 to 5 scoring. Weighted 25% of Business and Economic subsection. Maximum length 1,575 words]

We are committed to providing employees with training that will help them better understand the facility's standard operating procedures. We have nearly three years of experience operating cultivation facilities in Arizona, which includes an extensive employee training program. This program has proven successful, as we are one of only 15 organizations nationwide to earn the Americans for Safe Access Patient Focused Certification, which requires strict adherence to specific standard operating procedures, and we are in the process of earning a second certification.

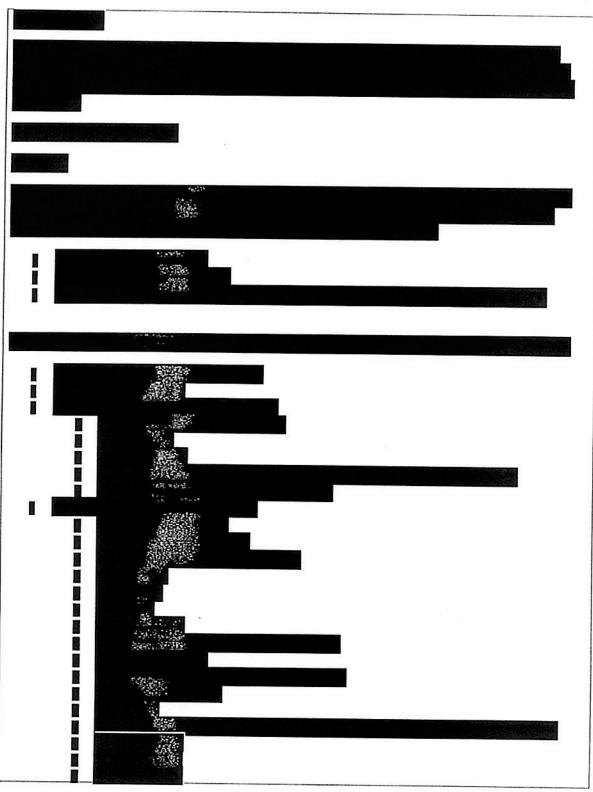
#### Instruction

The Cultivation Manager, Brett Saurof, leads employee training at our existing facility and will do so as the Cultivation Manager of the Maryland facility. Brett has over three years of management experience and has served for one year as Cultivation Manager. He has assisted in the development of our Operations Manual and provides training for all staff members. The standard operating procedures comprise a portion of the training, which is conducted primarily by Brett with supplemental instruction from department managers.

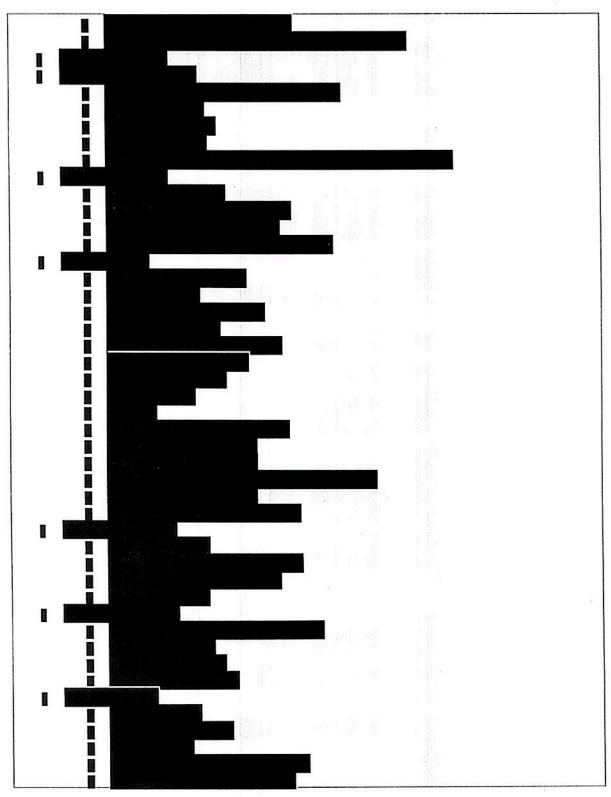
### Training Curriculum



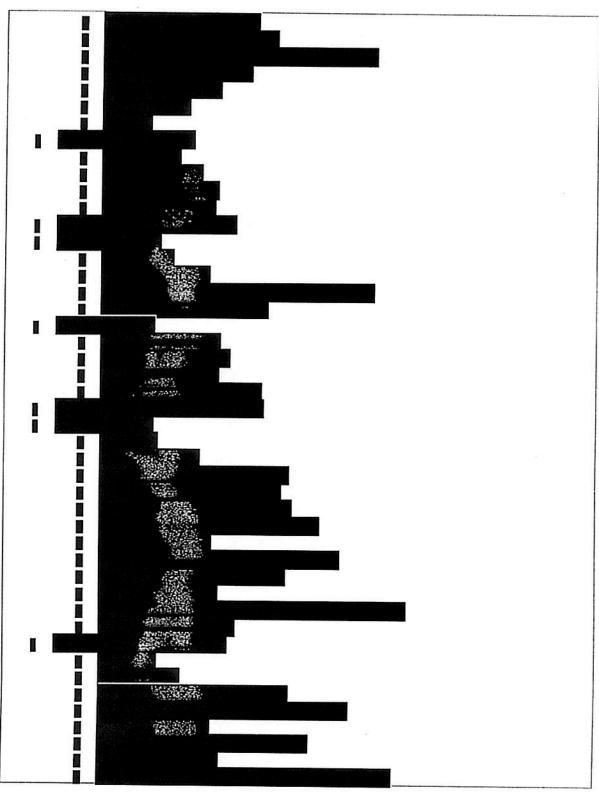




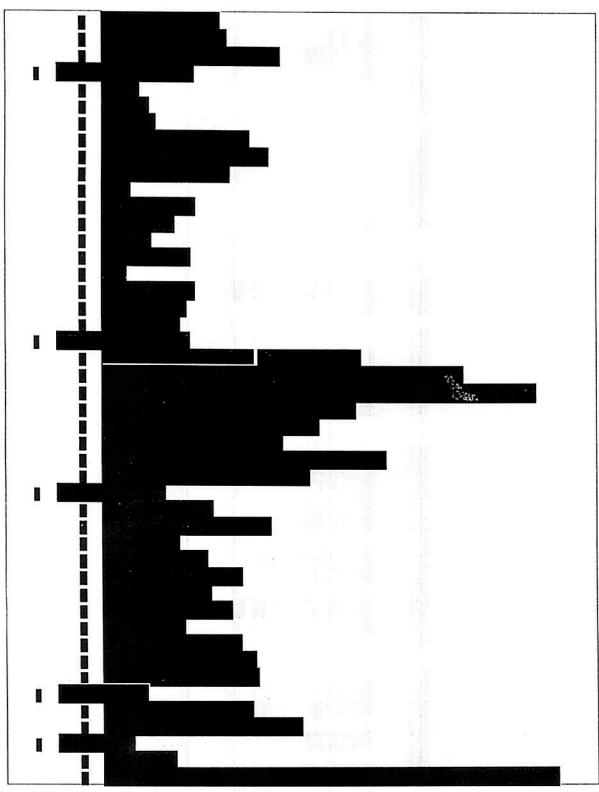




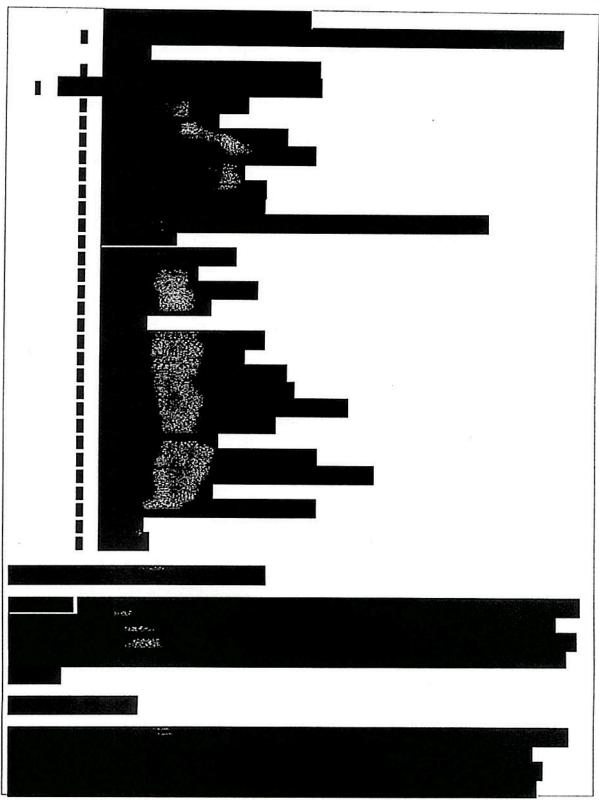




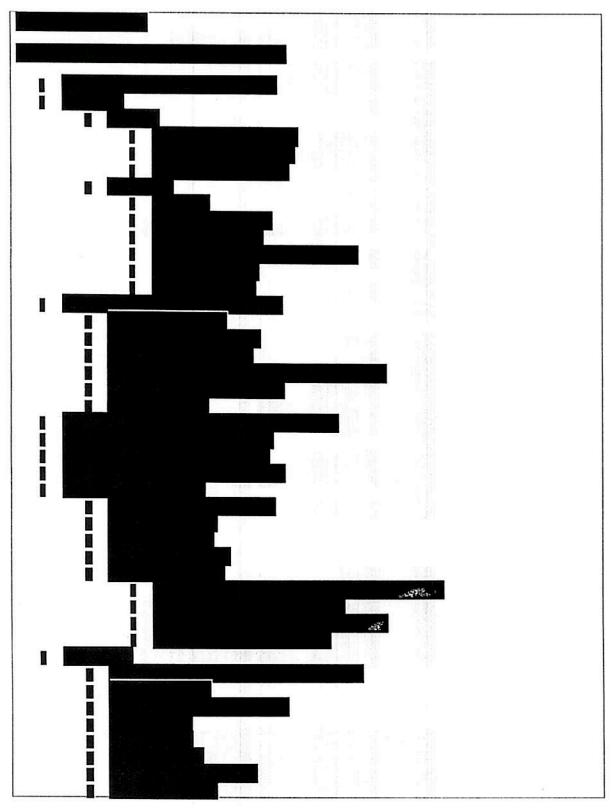




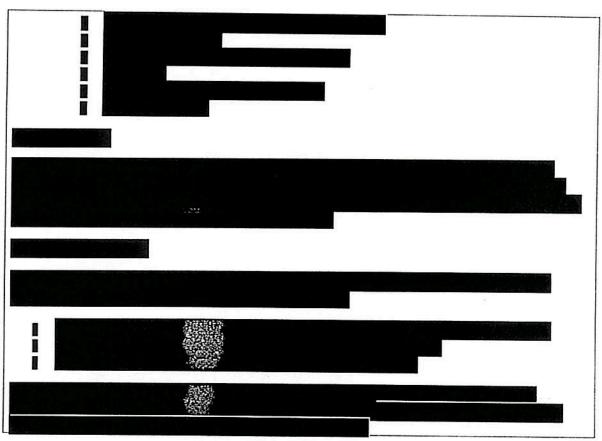






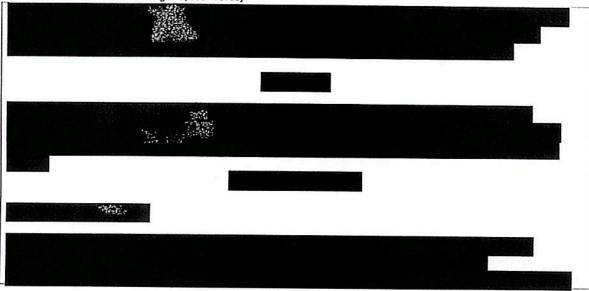




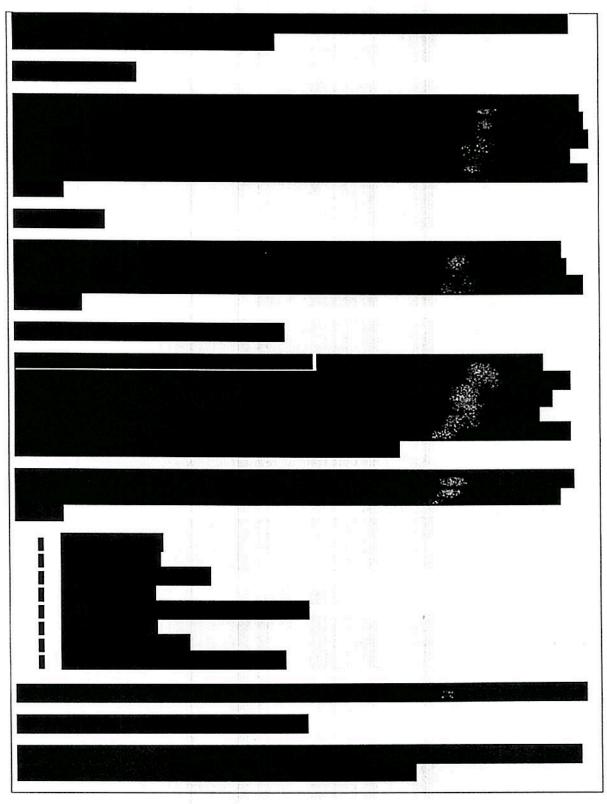


9. Please explain how the Applicant would train all registered grower agents on detection and prevention of diversion of medical cannabis. \*

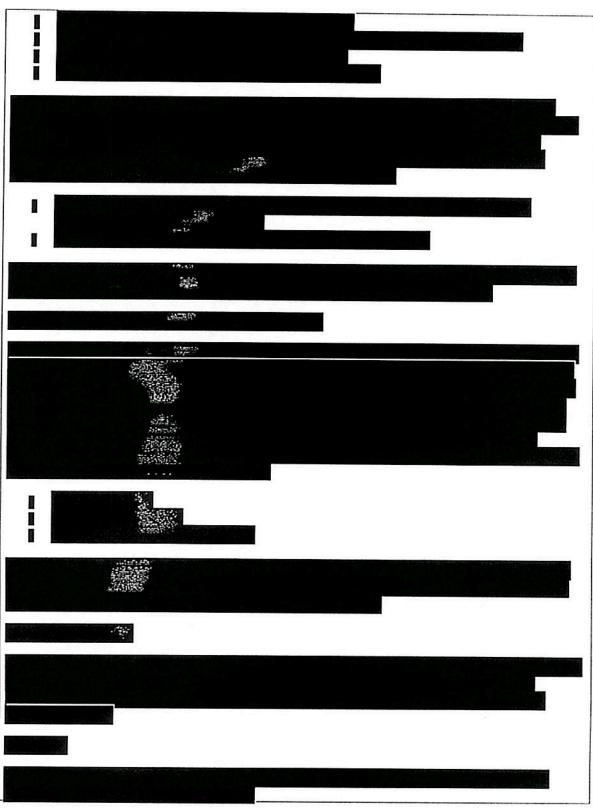
[Reference 10.62.09.07 of the regulations. Graded 0 to 5 scoring. Weighted 9.5% of Safety and Security subsection. Maximum length 1,285 words]



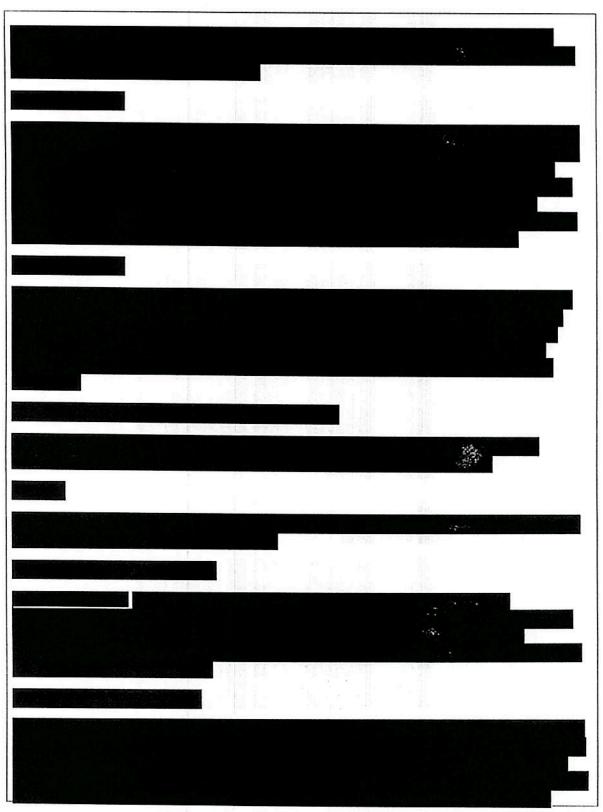












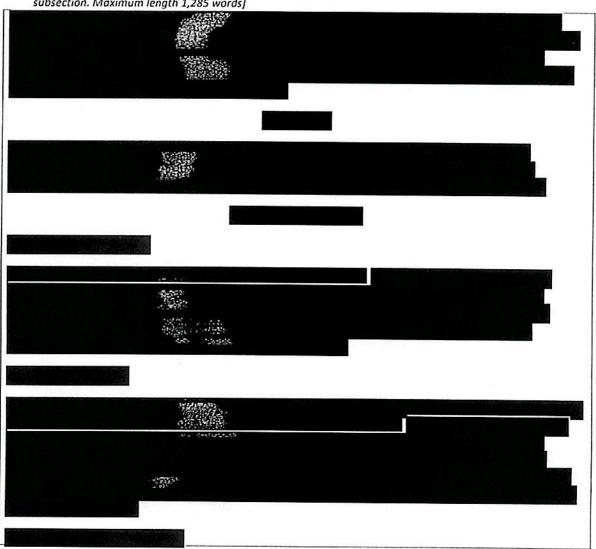


### Weekly Staff Meetings

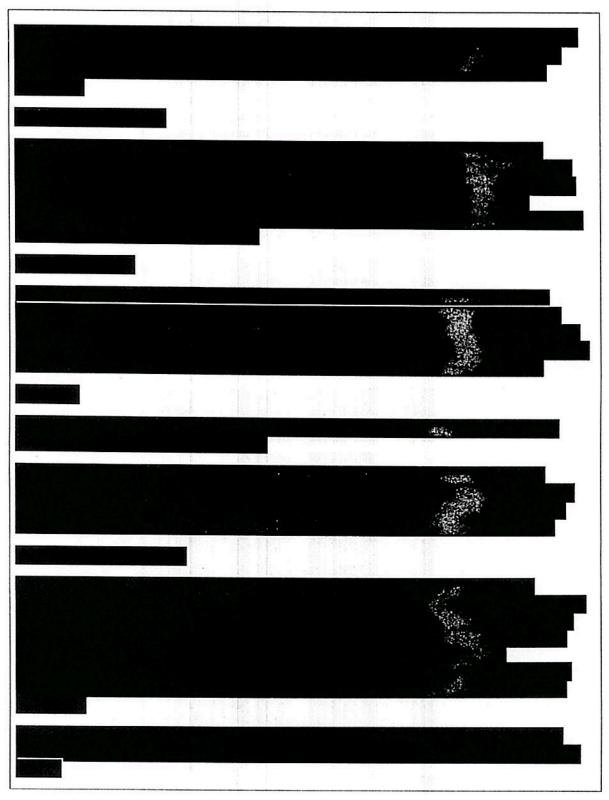
Employees are also required to attend weekly staff meetings held by the Cultivation Manager or department managers. One purpose of the staff meetings is to discuss potential diversion techniques and how to best prevent them. In our existing facilities we have had success motivating employees to remain current on diversion detection techniques through the use of pop quizzes and monetary rewards for prepared employees, and will continue this practice in Maryland to ensure full compliance.

### Please explain how the Applicant would train all registered grower agents on security procedures. \*

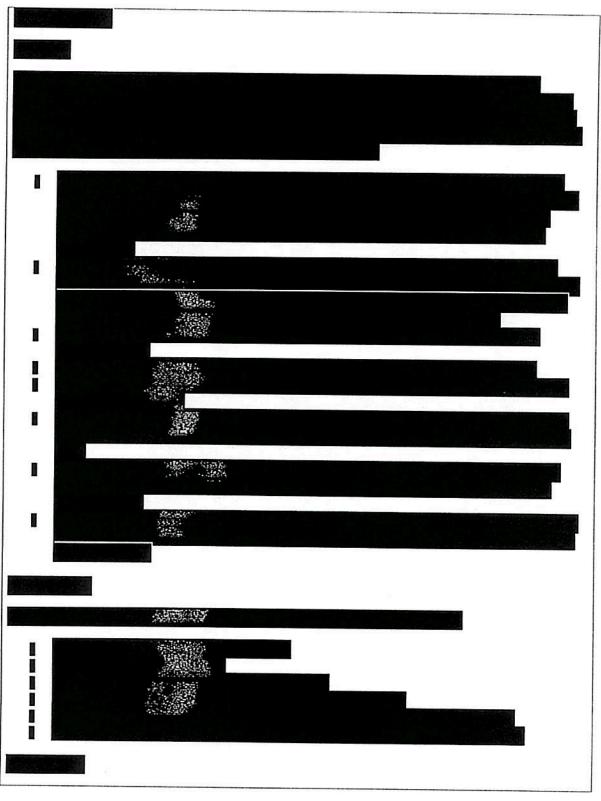
[Reference 10.62.09.07 of the regulations. Graded 0 to 5 scoring. Weighted 9.5% of Safety and Security subsection. Maximum length 1,285 words]



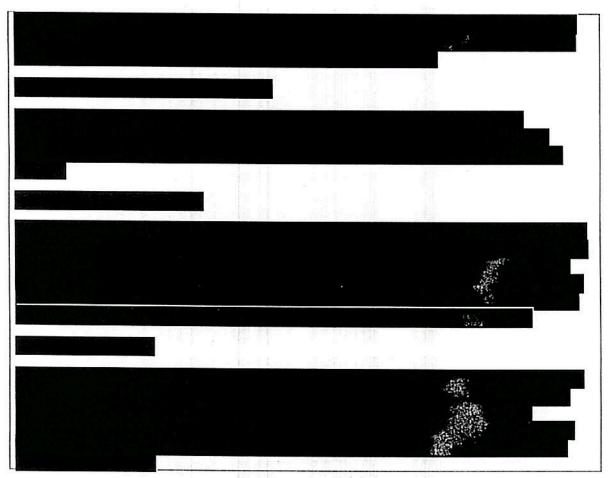










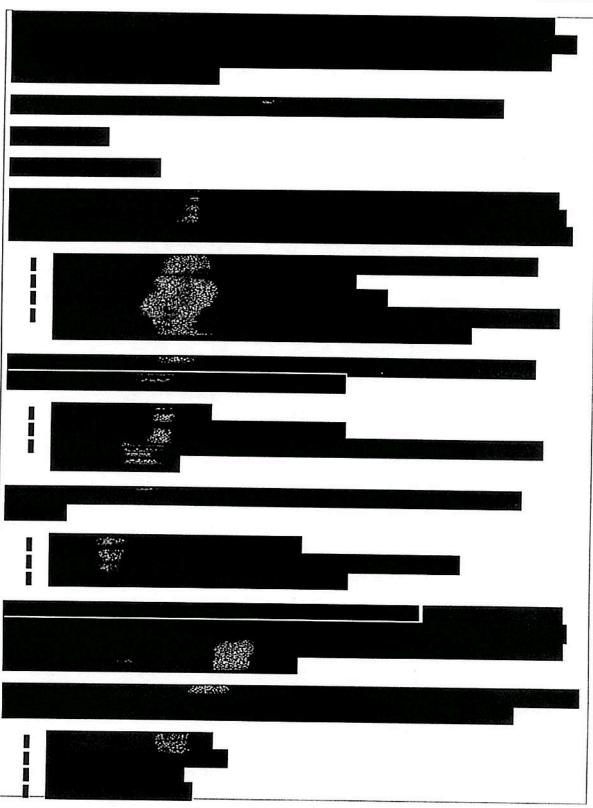


- 11. Please explain how the Applicant would train all registered grower agents on safety procedures, including responding to a (1) medical emergency, (2) a fire, and (3) a chemical spill. \*
  - (1) [Reference 10.62.09.07 of the regulations. Graded 0 to 5 scoring. Weighted 5% of Safety and Security subsection. Maximum length 675 words]
  - (2) [Reference 10.62.09.07 of the regulations. Graded 0 to 5 scoring. Weighted 5% of Safety and Security subsection. Maximum length 675 words]
  - (3) [Reference 10.62.09.07 of the regulations. Graded 0 to 5 scoring. Weighted 5% of Safety and Security subsection. Maximum length 675 words]

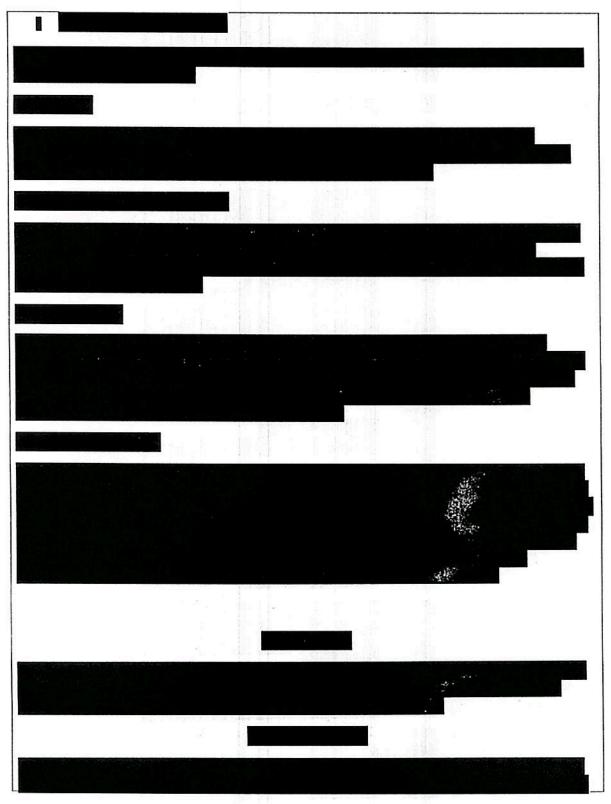
### (1) Instruction

The Cultivation Manager leads all training related to medical emergencies. In addition, the Applicant has formed a relationship with Stephen Barnhart, Chief of the Hancock Rescue Squad, who has agreed to lend his expertise to the training process.

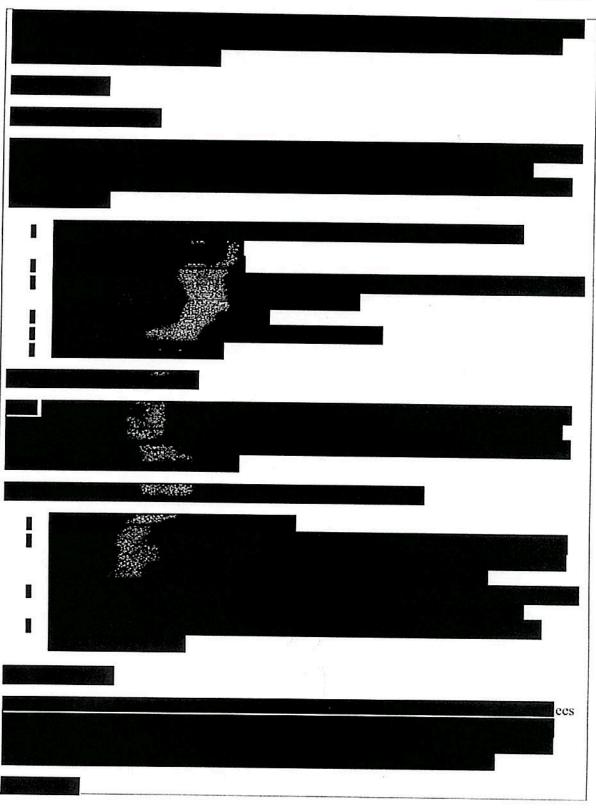




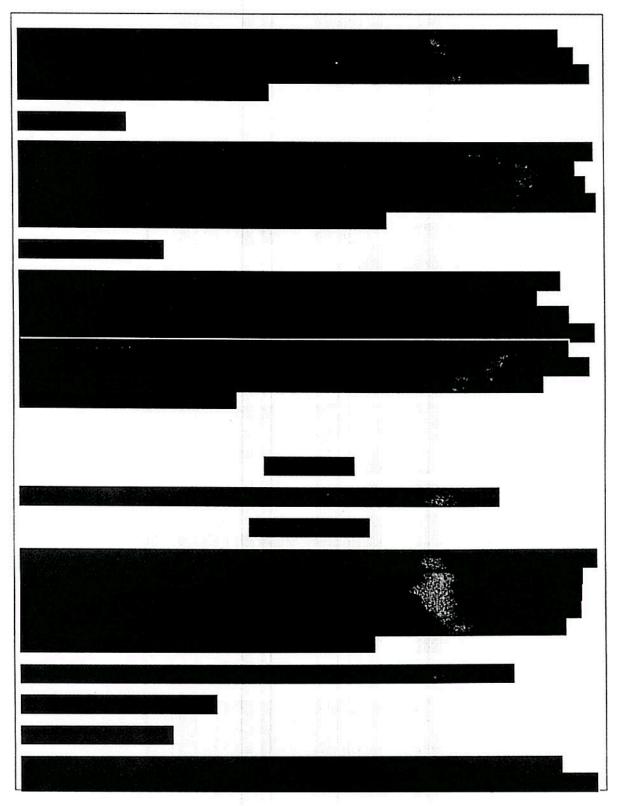




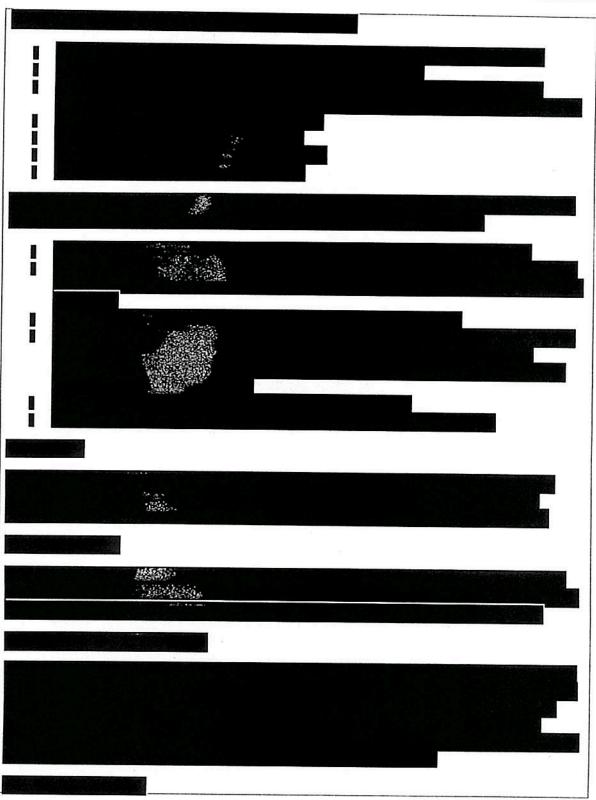














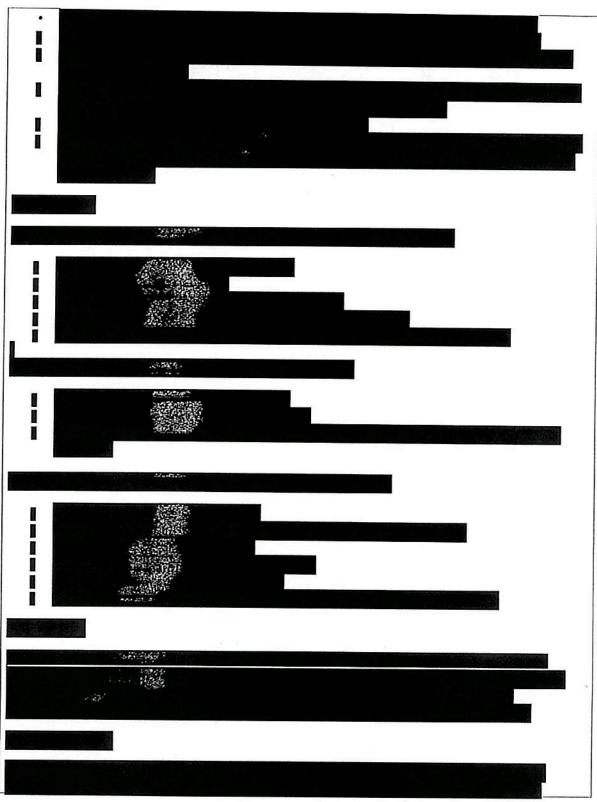
Employees are also required to attend weekly staff meetings held by the Cultivation Manager or department managers. There, chemical spill response training is regularly reviewed and revised as necessary to comply with all other applicable standards of the federal Occupational Health and Safety Administration and any applicable Maryland state or local worker safety requirements. In our existing facilities we have had success motivating employees to remain current on chemical spill response through the use of pop quizzes and monetary rewards for prepared employees, and will continue this practice in Maryland to ensure full compliance.

12. Please explain how the Applicant would train all registered grower agents on safety procedures, including responding to threatening events including an armed robbery, an invasion, a burglary, and any other criminal incident. \*

[Reference 10.62.09.07 of the regulations. Graded 0 to 5 scoring. Weighted 5.5% of Safety and Security subsection. Maximum length 745 words]

# Instruction The Security Manager will lead training related to threatening event response. In addition, the Applicant has established a relationship with Chief Buskirk of the Hancock, Maryland Police Department, who has agreed to lend his expertise to these training efforts.







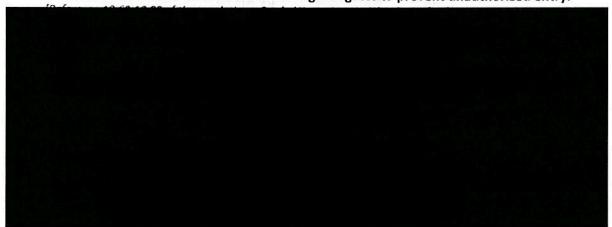


### Weekly Staff Meetings

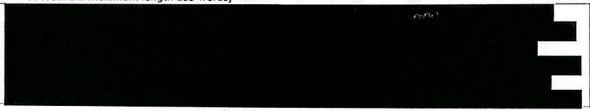
Employees are required to attend weekly staff meetings held by the Cultivation Manager or department managers. There, threatening event response training will be regularly reviewed and revised as necessary to comply with all other applicable standards of the federal Occupational Health and Safety Administration and any applicable Maryland state or local worker safety requirements. In our existing facilities we have had success motivating employees to remain current on threatening response training through the use of pop quizzes and monetary rewards for prepared employees, and will continue this practice in Maryland to ensure full compliance.

### 10.62.10.03

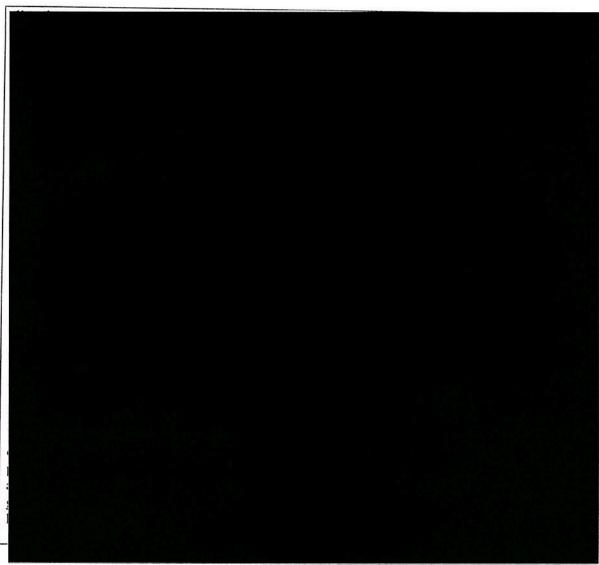
13. Please explain how the Applicant would securely surround licensed premises for field cultivation of medical cannabis with fencing and gates to prevent unauthorized entry. \*



- 14. Please describe how the fencing and gates will be equipped with a security alarm system that (1) covers the entire perimeter, (2) is continuously monitored, and (3) is capable of detecting power loss. \*
  - (1) [Reference 10.62.10.03 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (2) [Reference 10.62.10.03 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (3) [Reference 10.62.10.03 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

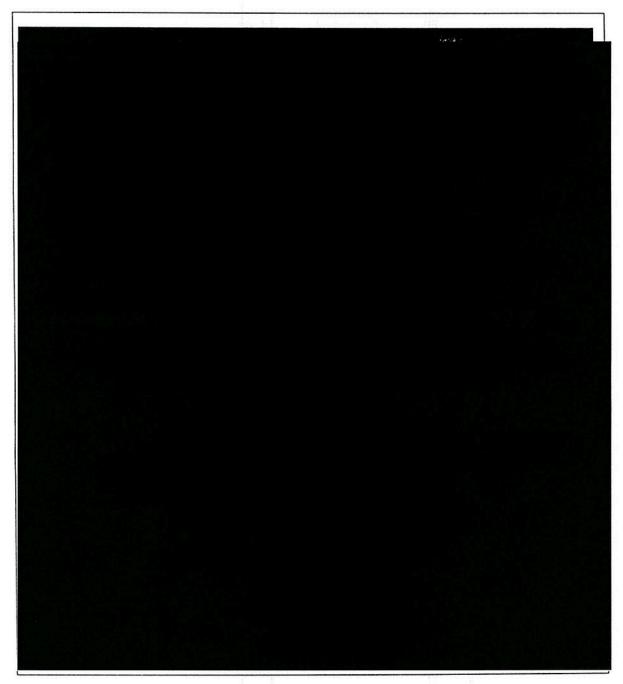






- 15. Please describe how the premises will be protected by a video surveillance recording system to ensure (1) surveillance of the entire perimeter of the area of cultivation, (2) surveillance over all portions of the security fence and all gates, and (3) adherence to the video surveillance requirements of this chapter. \*
  - (1) [Reference 10.62.10.03 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (2) [Reference 10.62.10.03 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (3) [Reference 10.62.10.03 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security

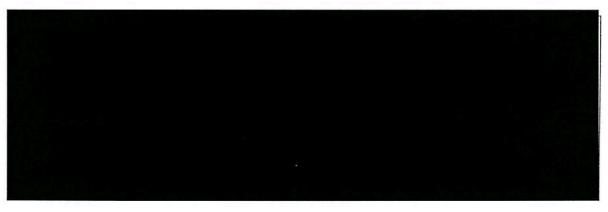




16. Please explain how a video surveillance system will be supported by adequate security lighting which may be modified as necessary to include motion control sensors, to protect light-dark cycles for proper cultivation. \*

[Reference 10.62.10.03 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

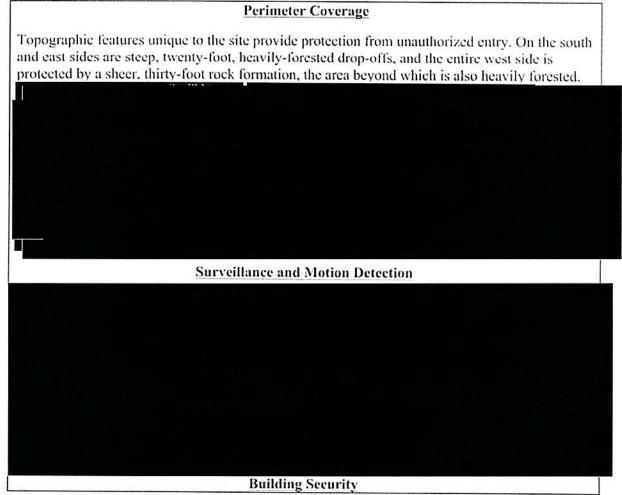




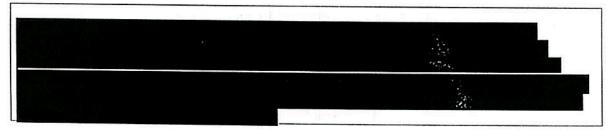
### 10.62.10.04

17. Please explain how the Applicant would construct a licensed premises to prevent unauthorized entry. \*

[Reference 10.62.10.04 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]







### 10.62.10.05

18. Please describe how the Applicant's lighting fixtures will be designed and installed to ensure proper surveillance. (Note: this regulation does not apply to lighting in areas of the premises used to cultivate medical cannabis.) \*

[Reference 10.62.10.05 of the regulations. Graded 0 to 5 scoring. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

For security purposes, it is critical to have sufficient exterior lighting between sunset and sunrise that adequately illuminates the facility and its immediate surrounding area, including storage areas, parking lots, and entry areas such as the front façade. Outdoor lighting will be hooded and/or oriented so as to deflect light away from adjacent properties and will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles, and license plates within 40 feet of the building(s). Where medical cannabis is greenhouse-grown, the security lighting will not be constantly illuminated, but will be motion activated to ensure proper light-dark cycles for cultivation. Cultivation facility lighting will comply with all Commission and Maryland state and local rules and regulations.

Please see Addendum D for a site plan with proposed lighting locations.

### 10.62.10.06

19. Please describe how the Applicant would maintain a security alarm system that covers all perimeter entry points and portals at all premises. \*

[Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]

The Applicant will maintain a security alarm system that includes a series of devices that cover all perimeter entry points and portals. This equipment will be installed to monitor the facility's perimeter, roof, windows, and entrances and exits.

Fencing surrounding the site provides an opportunity for potential unauthorized entry. Thus, the

system that detects and locates walking, running, or crawling intruders, and chain-link fencing

to cut or climb fencing. These two systems will network seamlessly to create an integrated perimeter intrusion detection system. Gates leading into the facility will also be equipped with alarms to monitor breach or unauthorized entry and will be staffed with a 24-hour security quard

### DHMH–Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



that control access through fingerprint identification and a PIN-code. Glass-break detectors will monitor for the sounds of broken windows, and interior motion sensing alarms will also be installed to cover all doors, windows, and other access points. Attempts to breach any entrance will trigger an alarm that notifies the Security Manager, the security alarm monitoring company, and local law enforcement.

To ensure continuous operation, the Security Manager will inspect, test, and maintain all aspects of the security alarm system every 30-calendar days and, on an annual basis, obtain a security system audit by a third-party vendor.

Finally, we will contract with a security co

mpany, whereby State-licensed security guards will patrol the exterior of the premises both during and after business hours.

- 20. Please describe how the security system will be (1) continuously monitored, (2) capable of detecting smoke and fire, and (3) capable of detecting power loss. \*
  - (1) [Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (2) [Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words] (3) [Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
- (1) The Applicant will contract with a licensed professional security system monitoring company to monitor the cultivation facility security system on a 24-hour basis. In addition, all employees will be trained by the Security Manager to detect security system alerts and malfunction. When armed, any breach of perimeter fencing, restricted access security doors, broken windows, or unauthorized movement within or on the roof of the facility will notify the monitoring company, the Security Manager, and the local police department. To ensure continuous monitoring, the Security Manager will inspect, test, and maintain all security-related equipment every thirty-calendar days and annually obtain a security system audit by a third-party vendor. Backup power will ensure the system remains operational during power loss.
- (2) The security system will include heat detectors, ionization smoke alarms (detect fast-flaming fires), and photoelectric smoke alarms (detect slow-smoldering fires). When triggered, the system will initiate sprinklers and notify the security alarm company and the Security Manager. The Security Manager will inspect, test, and maintain all smoke and fire detection equipment every 30-calendar days and, on an annual basis, obtain a system audit conducted by a third-party vendor.
- (3) During power loss, the security system will have power provided by a battery-operated Uninterruptable Power Supply (UPS) while the backup generator engages. The generator will automatically engage when power is lost. Once power is restored, the system will transfer to

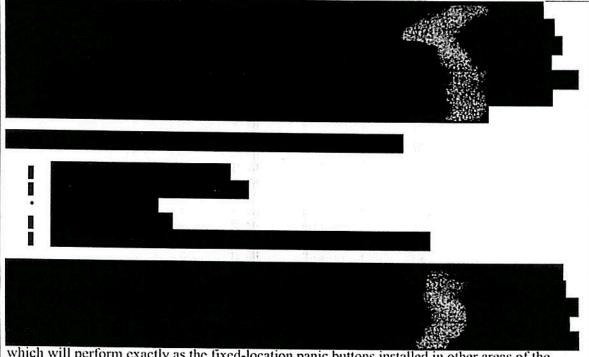
### DHMH–Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



primary power and the generator will disengage. If the generator fails, the UPS will supply sufficient power to operate the security alarm system for at least 48 hours.

21. Please describe how the security alarm system will include panic alarm devices mounted at convenient, readily-accessible locations throughout the licensed premises. \*
[Reference 10.62.10.06 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]



which will perform exactly as the fixed-location panic buttons installed in other areas of the facility.

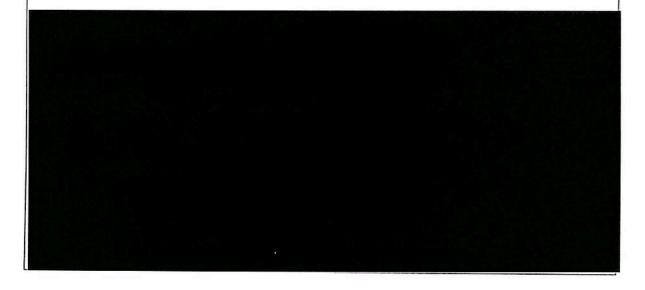
Effective use of panic buttons requires special training and frequent drills to prevent false activations. All employees must complete panic button training with the Security Manager, who is responsible for ensuring this training occurs with all new employees and for periodically quizzing agents to ensure knowledge is retained. The Security Manager is also responsible for systematic testing of panic buttons and all security equipment to ensure proper operation.

Panic button training will include the following:

- What a panic button is and how it works
- The location of panic buttons
- What happens when the panic button is activated
- The circumstances where a panic button should be activated
- The protocol for how to effectively and safely engage a panic button in an emergency situation



- 22. Please describe how a second, independent security alarm system will be used to protect (1) a location where records are stored on-site, (2) a location where records are store off-site, and (3) a cabinet or room that holds medical cannabis. \*
  - (1) [Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (2) [Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (3) [Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
- (1) All records will be stored in 1) a locked filing cabinet (hard copies of records) or 2) a password-protected computer (digital records) or DVS system (video surveillance footage), both of which will be located. This office will be protected by an alarm system independent from the main facility alarm system, and will be comprised of a restricted access security door and motion sensing alarm. This system will be monitored on a 24-hour basis by a security alarm monitoring company, and access will be made available only to the security door or unauthorized movement within the office will trigger an alarm that will notify the security alarm company, the Security Manager, and local law enforcement officials.
- (2) The Applicant will contract with a records management company, such as Iron Mountain, to provide off-site storage of all physical (i.e., hard-copy), digital, and video surveillance records. The security and alarm systems at such companies are extensive, and generally include intrusion detection, physical access controls, fire detection and suppression systems, server and data encryption, and 24-hour central monitoring. In addition, these facilities are constructed to be resistant to seismic activity, tornadoes, hurricanes, and other natural and manmade disasters, and offer environmental control systems to ensure the preservation of all physical and digital records. When necessary, next-day, half-day, and emergency retrieval services are available to ensure quick access and compliance with Commission requests.





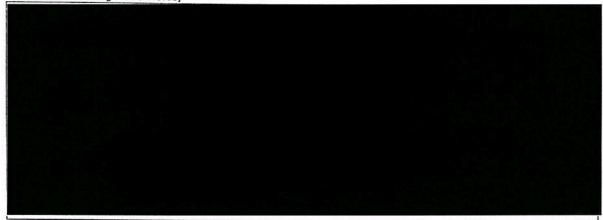
23. Please describe how the security alarm system shall remain operational until the licensed premises no longer has any medical cannabis, seeds, or cuttings on the premises. \*

[Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]



24. Please describe how the security alarm system will be equipped with auxiliary power sufficient to maintain operation for at least 48 hours. \*

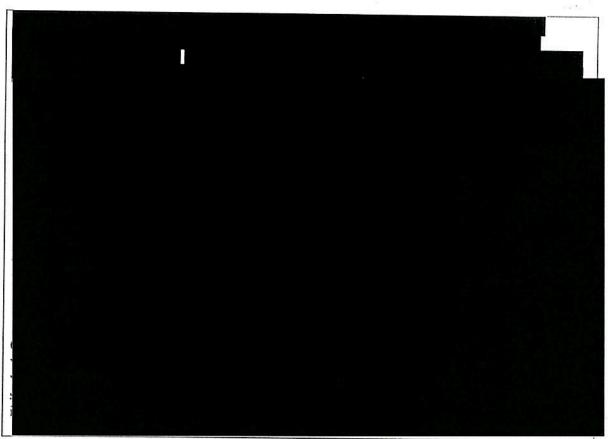
[Reference 10.62.10.06 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]



### 10.62.10.07

- 25. Please describe how the Applicant will maintain a motion-activated video surveillance recording system at all premises that (1) records all activity in images of high quality and high resolution capable of clearly revealing facial detail, (2) operates 24-hours a day, 365 days a year without interruption, and (3) provides a date and time stamp for every recorded frame. \*
  - (1) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (2) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
  - (3) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]





# 26. Please explain how the Applicant will post appropriate notices advising visitors of the video surveillance. \*

[Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]

Appropriate signage will be posted to inform visitors of the use of video surveillance on the premises of the cultivation facility. These notices will be posted at all exterior points of entry and exit, as well as in all spaces where medical cannabis plants are located, packaged, and stored. Notices will read, "NOTICE: All activities on these premises are recorded by 24-hour video surveillance."

# 27. Please explain how the surveillance camera will be located and operated to capture each exit from the premises. \*

[Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

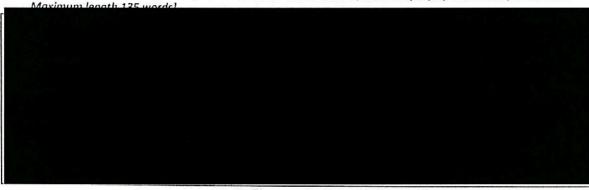




- 40

28. Please explain how the surveillance camera will capture activity at each entrance to an area where medical cannabis is grown, tested, cured, manufactured, processed, or stored.

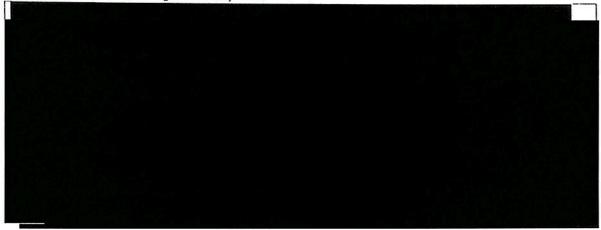
[Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection.



29. Please describe how a recording of all images captured by each surveillance camera shall be kept (1) at the licensed premises and (2) at an off-site location. \*

(1) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]

(2) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 0.5% of Sofety and Security subsection. Maximum length 70 words]



30. Please describe how the storage of all recordings will be (1) access-limited, (2) secured by a security alarm system that is independent of the main premises security alarm system, (3) in a format that can be easily accessed for investigational purposes, and (4) retained for a minimum of 30 calendar days. \*

(1) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

### DHMH-Maryland Medical Cannabis Commission

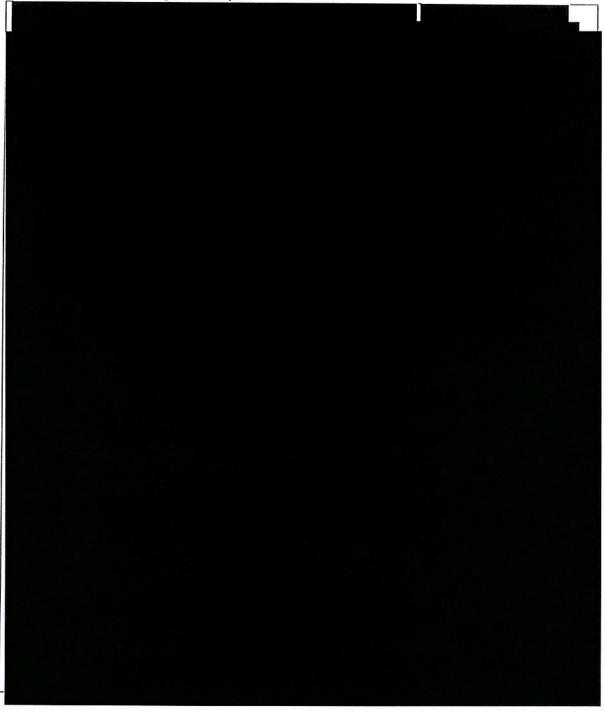
Application for Medical Cannabis Grower License



(2) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

(3) [Reference 10.62.10.07 of the regulations. Graded 0 to 5 scoring. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

(4) [Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]



### DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



records management company storage location for the previous 60 calendar days. Recordings will only be made available at the discretion of the Security Manager.

31. Please describe how any recording of security video surveillance shall be made available to the Commission or law enforcement agency for just cause as requested. \*

[Reference 10.62.10.07 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]

This video surveillance system will be capable of exporting clear, still images in .JPG, .BMP, and .GIF formats, as well as exporting Windows-compatible videodisks of the video recordings. Our video surveillance system will archive proprietary formatting to ensure authentication and be able to save exported video in industry standard files as required by the Commission, state, and local law enforcement.

### 10.62.10.08

- 32. Please explain how a registered grower Applicant will, when visitors are admitted to a non-public area of the premises of a Licensee, (1) log the visitor in and out, (2) retain with the log a photocopy of the visitor's government-issued identification, (3) continuously visually supervise the visitor while on the premises, and (4) ensure that the visitor does not touch any plant or medical cannabis. \*
  - (1) [Reference 10.62.10.08 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (2) [Reference 10.62.10.08 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (3) [Reference 10.62.10.08 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]
  - (4) [Reference 10.62.10.08 of the regulations. Graded 0 to 5 scoring. Weighted 1% of Sofety and Security subsection. Maximum length 135 words]
- (1) The Security Manager must approve in advance the entrance of any individual other than a cultivation facility agent into the facility. Upon arrival, the visitor will be required to sign a logbook registering:
  - The visitor's name
  - The visitor's government-issued identification number (e.g., driver's license number)
  - The purpose of the visit
  - The date
  - The time in the facility

After signing in, the Security Manager will assign a cultivation facility agent to accompany the individual at all times. After completing his or her visit, the visitor will record the time out of the facility and sign the logbook. After the visitor exits the premises a cultivation facility agent will also sign logbook to verify the visitor's exit. Completed logbook entries will be stored in a locked filing cabinet in the Security Manager's office.

(2) As the visitor is completing the initial logbook entry, a cultivation facility agent will

### DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



photocopy the visitor's government issued identification card. Hard copies of the photocopied ID cards will accompany the hard copies of the visitor logbook entries and will be stored in a locked filing cabinet in the Security Manager's office. In addition, the hard copies of the photocopied ID cards will be scanned as .pdf files to create digital backup records, which will be stored on-site on the Security Manager's password protected computer and off-site by the records management company.

(3) Only visitors with a verified and scheduled appointment, confirmed in writing in advance by the Security Manager, will be permitted access to the facility. Visual supervision will be initiated by an exterior security agent. The exterior security agent will reconcile the visitor's name with the visitor manifest and ensure the visitor's physical appearance matches that of his/her picture ID. Once the visitor's identification has been verified, the exterior security agent will radio a second agent to escort the visitor to the parking area and then to the facility entrance.

After entering the facility, the escorting security agent will introduce the visitor to the lobby security agent, who will perform entry protocols (logbook completion, photocopy ID) and create a visitor identification badge. The badge will include a photo of the visitor, taken at the time of entry to the facility. The visitor will then be escorted and visually supervised by a security agent at all times. The agent escorting the visitor will be relieved of all other duties while the visitor is on the premises so that he or she may continuously visually supervise the visitor. If it is necessary for the escorting agent to cease supervision of the visitor (e.g., to visit the restroom), he or she must notify the Security Manager, who will resume supervision of the visitor in the agent's stead or assign another agent to do so.

When the appointment concludes and the visitor is ready to leave the cultivation facility, the security agent will escort the visitor to the lobby where s/he will return the visitor identification badge to the security agent on duty. At that point, the lobby security agent will radio the exterior security agent that the visitor has returned the identification badge, been logged out of the visitor's log, and is exiting the facility. S/he will also radio a second agent to escort the visitor to his/her vehicle and to the exterior gate. The exterior security agent will watch the visitor exit the facility's fenced and gated grounds.

(4) Any visitor who enters the cultivation facility will be accompanied at all times by a security agent who will ensure the visitor does not touch any cannabis plant or medical cannabis.

In addition to protecting against theft and diversion, security agents will be responsible for protecting cannabis and medical cannabis from contamination. If working in an area of the facility with cannabis plants or medical cannabis, a barrier such as a sheet or tarp will physically separate the visitor from the cannabis. In addition, the visitor will be required to wear a cultivation facility provided cleanroom uniform, comprised of hood, goggles, coveralls, gloves, and boots to protect cannabis and medical cannabis products from contamination.

When the visitor's appointment concludes, the security agent will escort the guest to the lobby to complete the exit protocol.



33. Please explain how the Applicant will maintain a log of all visitors to non-public areas for two years. \*

[Reference 10.62.10.08 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]

Hard copies of the logbook entries and photocopied government-issued identification card documentation will be stored in a locked filing cabinet in the Security Manager's office. Digital records of these documents will be stored on-site on the Security Manager's password protected computer and off-site by a records management company. All records will be kept for a minimum of two years and will be made available for inspection by the Commission.

### 10.62.11.02

- 34. Please describe how the Applicant would establish written standard operating procedures to promote good growing and handling practices including all aspects of the (1) irrigation, propagation, cultivation, and fertilization, (2) harvesting, drying, and curing, (3) rework or processing, (4) packaging, labeling, and handling of medical cannabis byproduct, and (5) waste products, and the control thereof, to promote good growing and handling practices. \*
  - (1) [Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 15% of Operational subsection. Maximum length 2,025 words]
  - (2) [Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 15% of Operational subsection. Maximum length 2,025 words]
  - (3) [Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 15% of Operational subsection. Maximum length 2,025 words]
  - (4) [Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 15% of Operational subsection. Maximum length 2,025 words]
  - (5) [Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 7.5% of Production Control subsection. Maximum length 475 words]
- (1) Over the past three years, we have developed and practice extensive standard operating procedures (SOPs) at our existing cultivation facilities, including procedures for irrigation, propagation, cultivation, and fertilization, which have been thoroughly vetted and approved of by the Arizona Department of Health Services, the Nevada Department of Health and Human Services, and Americans for Safe Access.

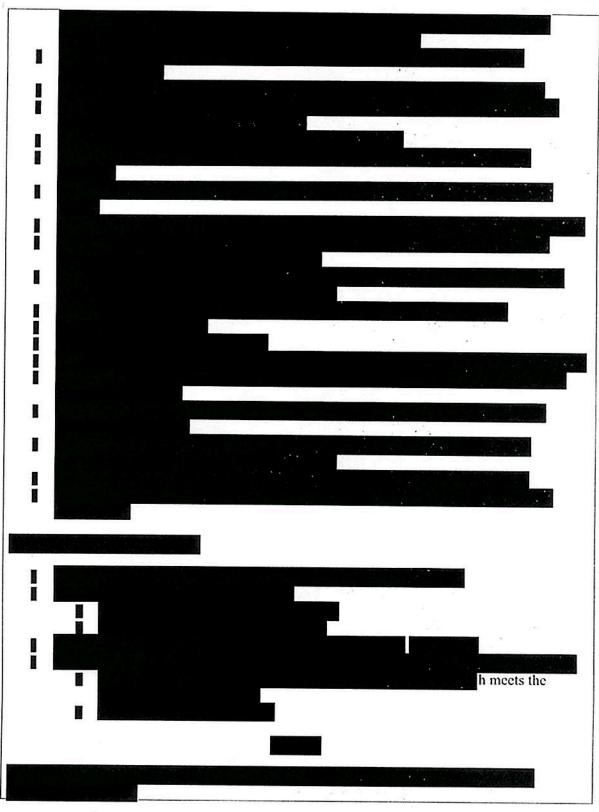
We will apply these procedures to cultivate medical cannabis that meets or exceeds Maryland regulations and the American Herbal Products Association's (AHPA) cannabis cultivation recommendations.

### Compliance with American Herbal Products Association Standards

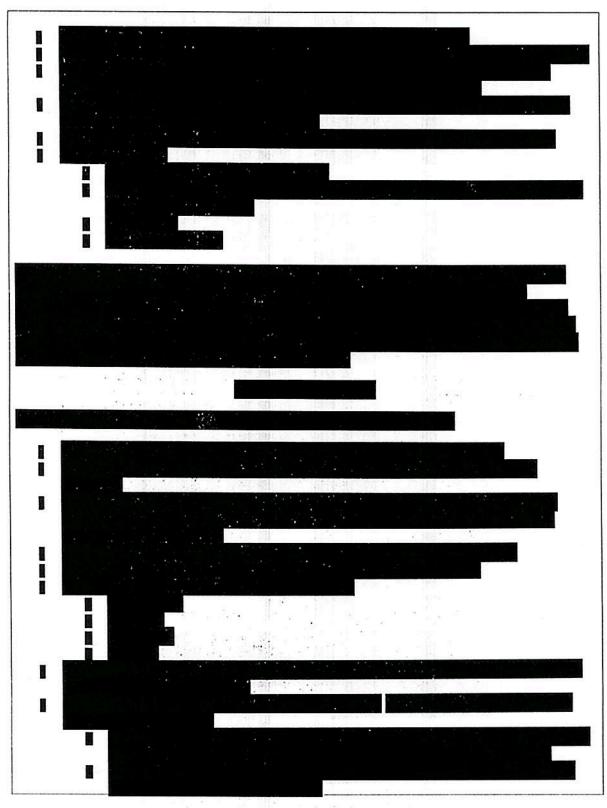
In accordance with AHPA standards, our cultivation agents:

8				
•				-

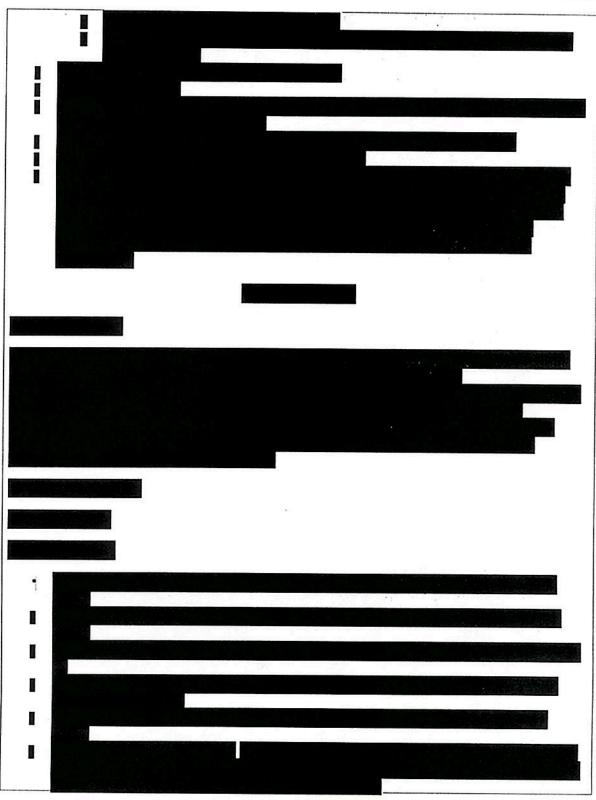




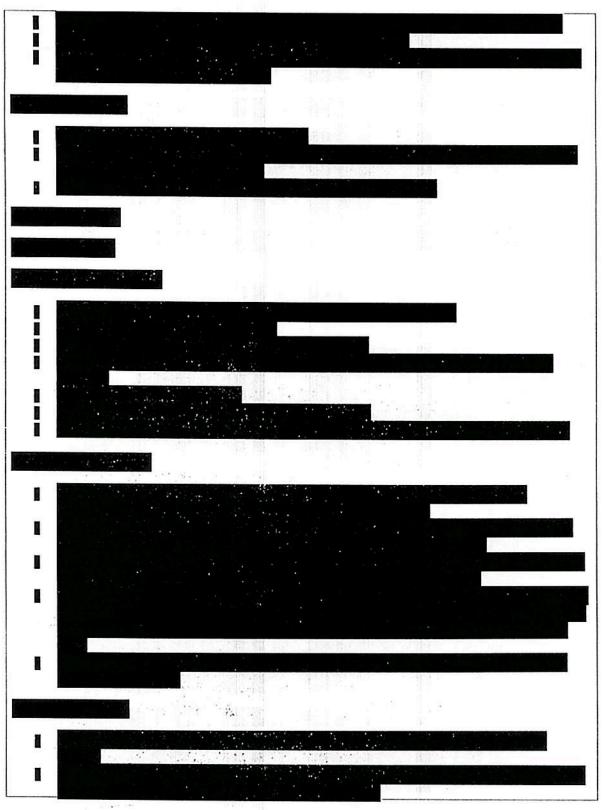




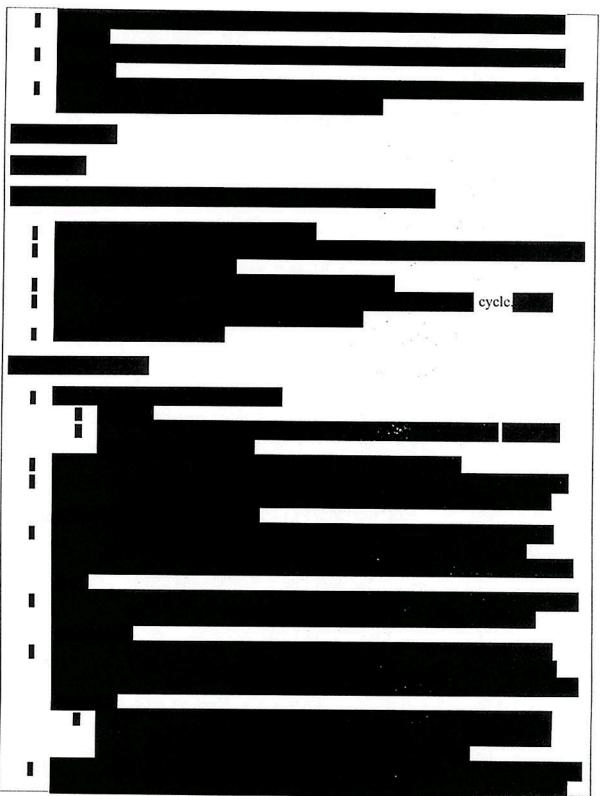




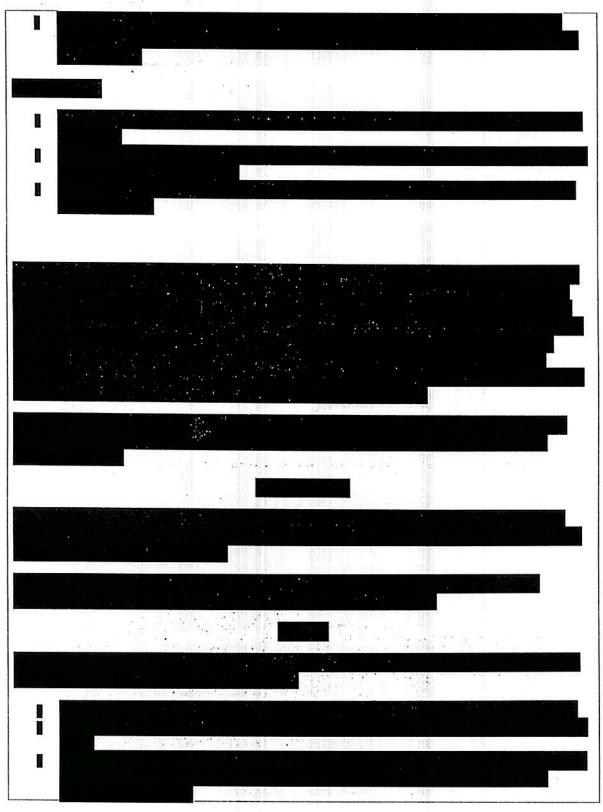




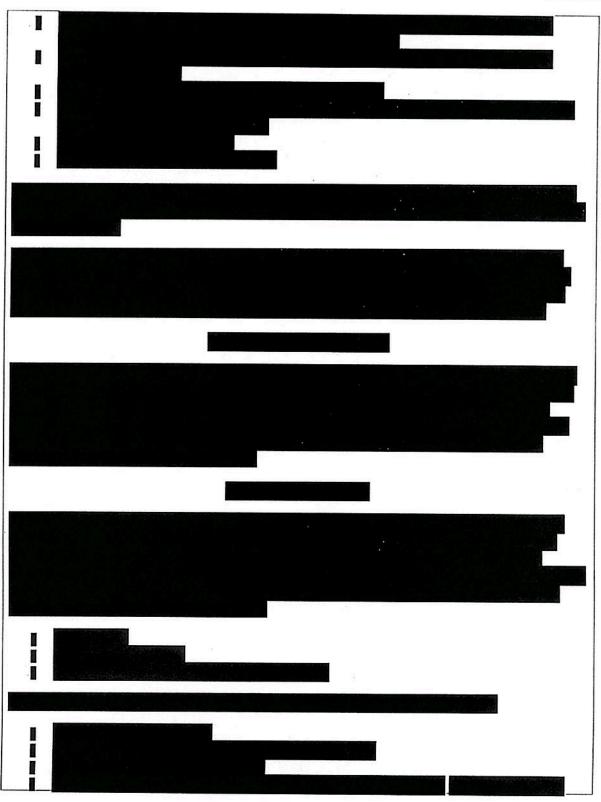




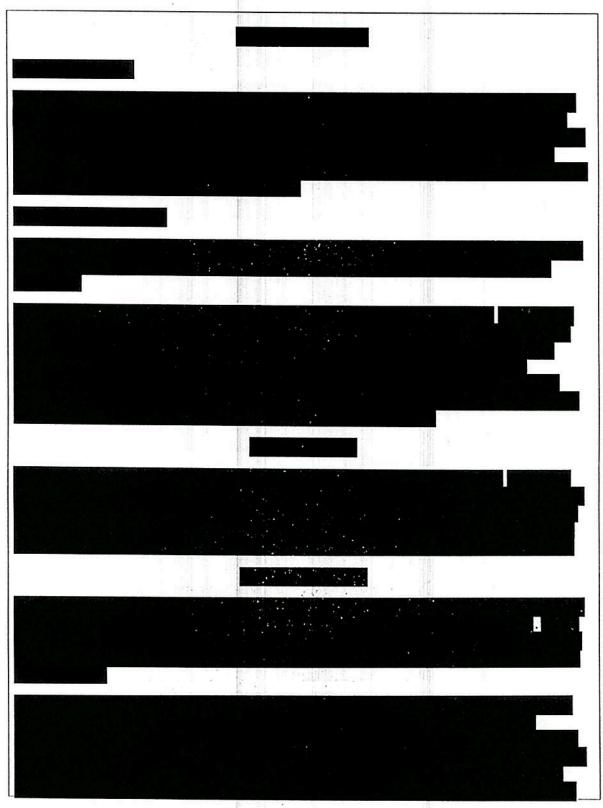




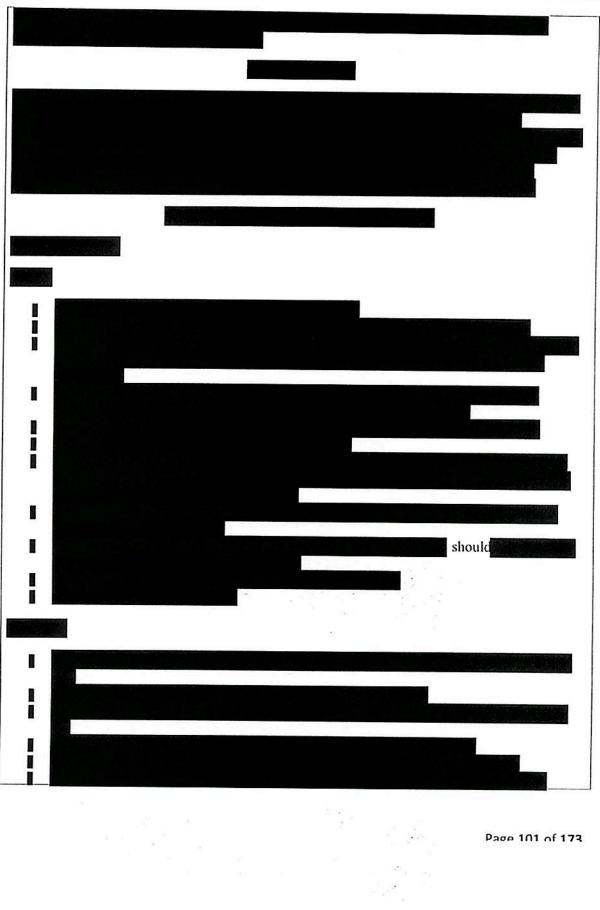




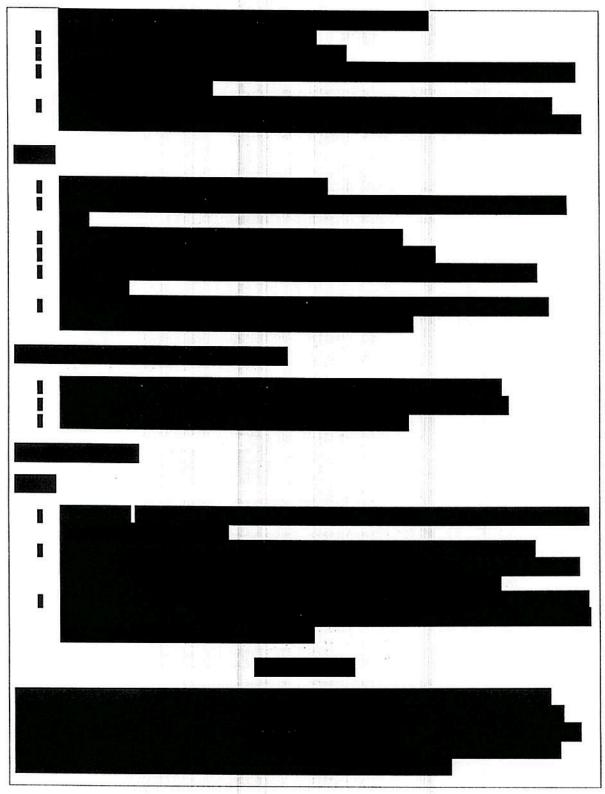




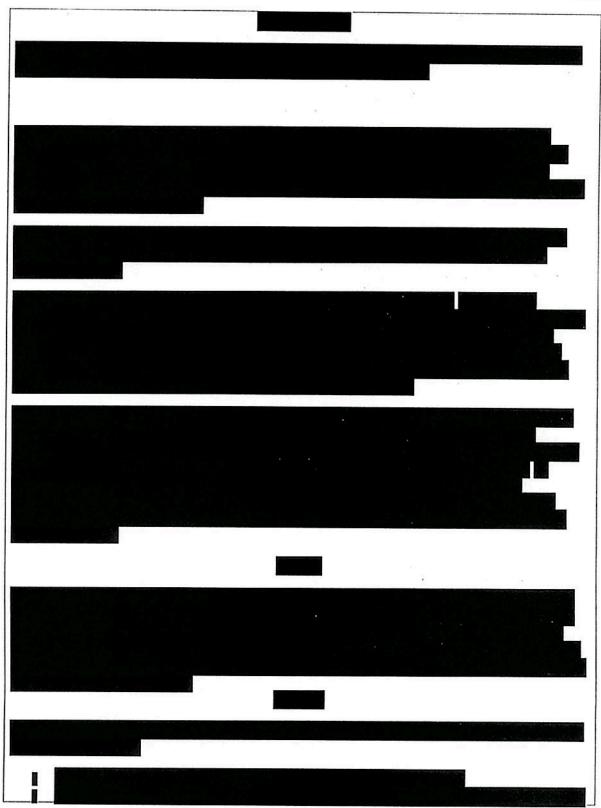




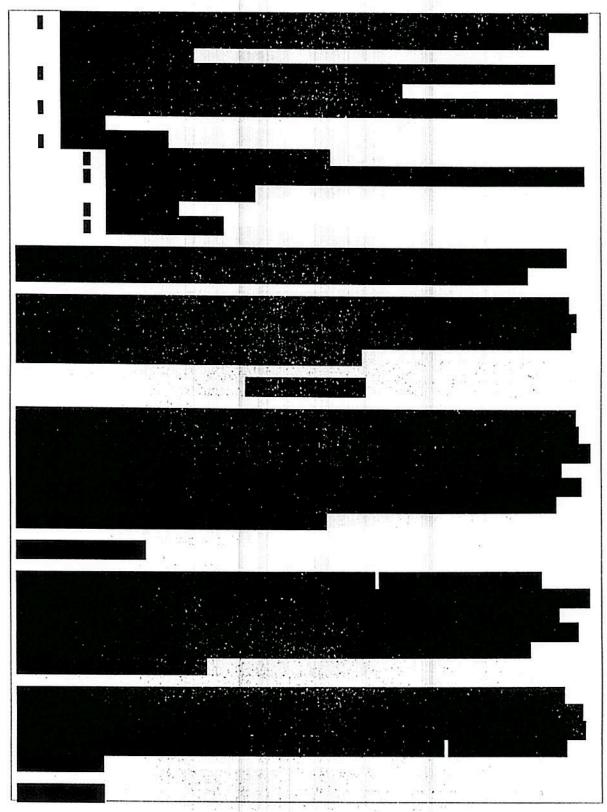




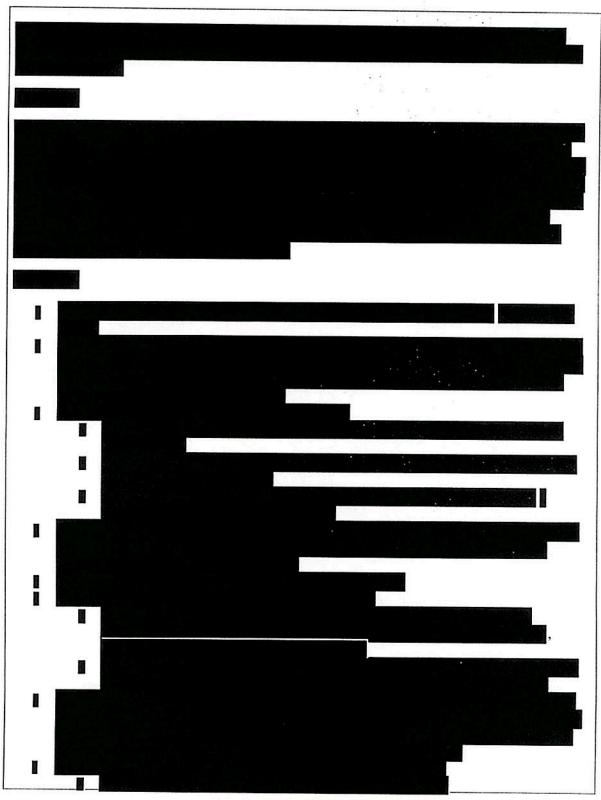




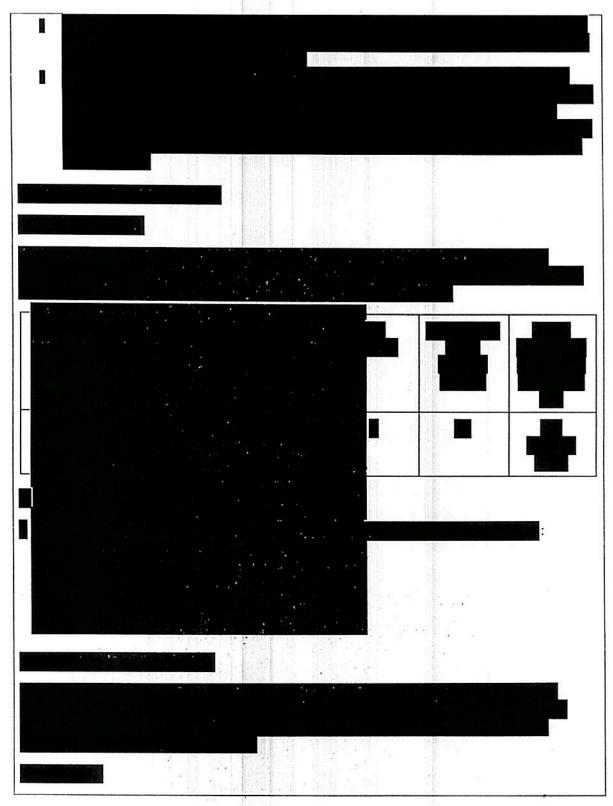




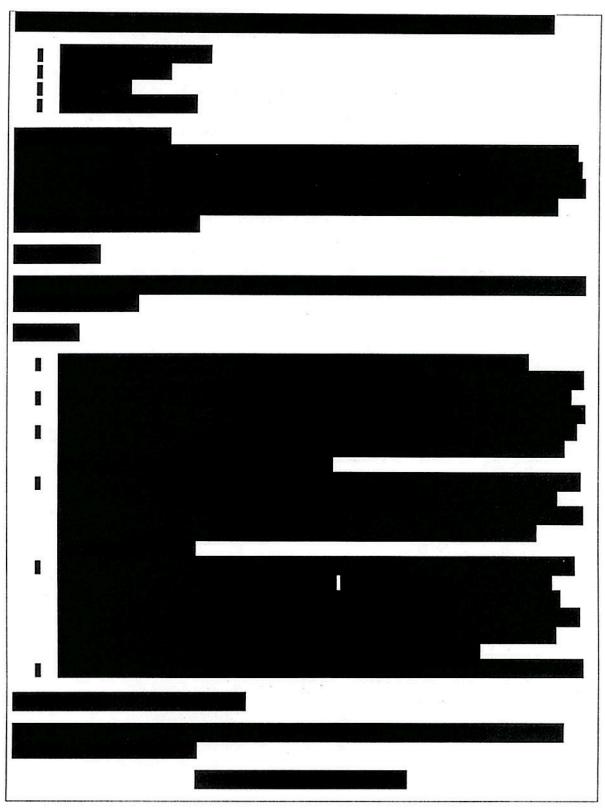




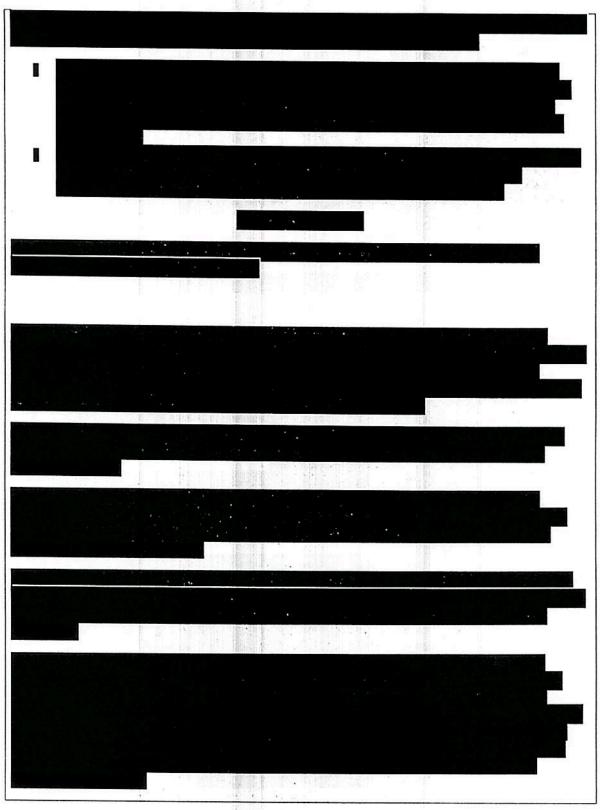




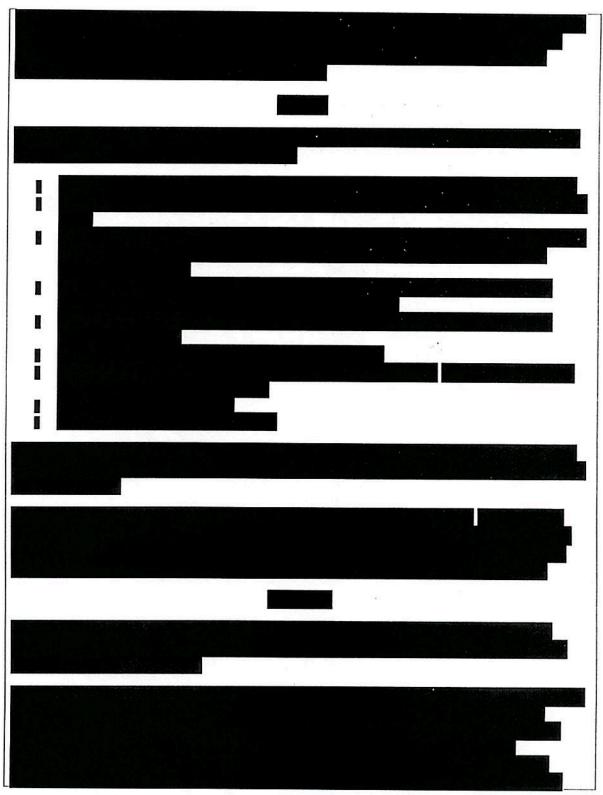




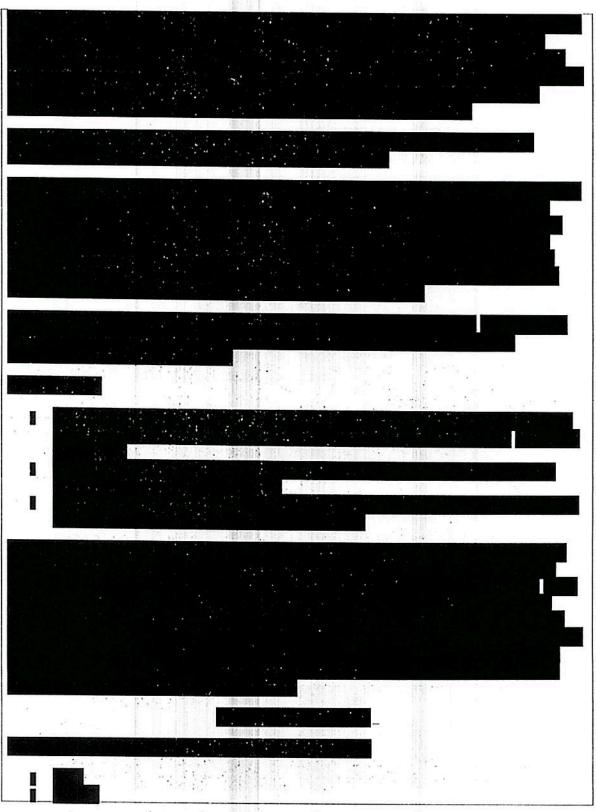




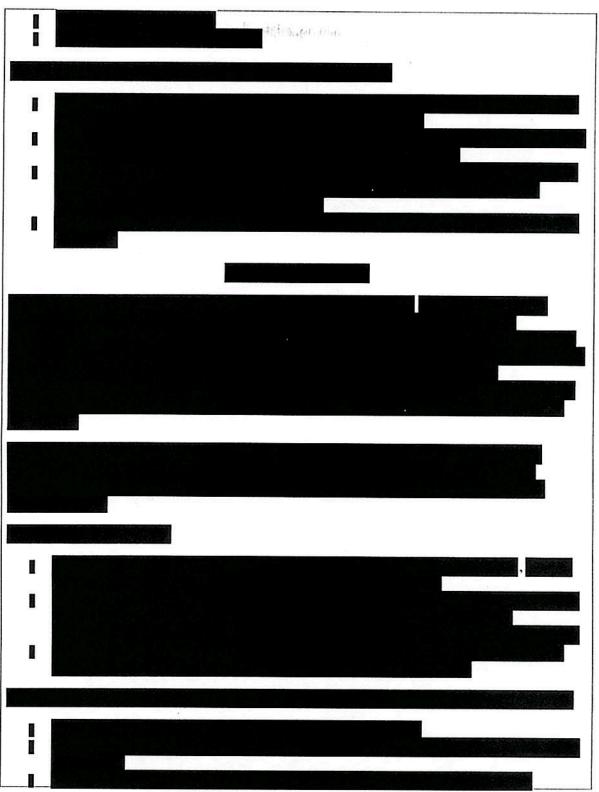




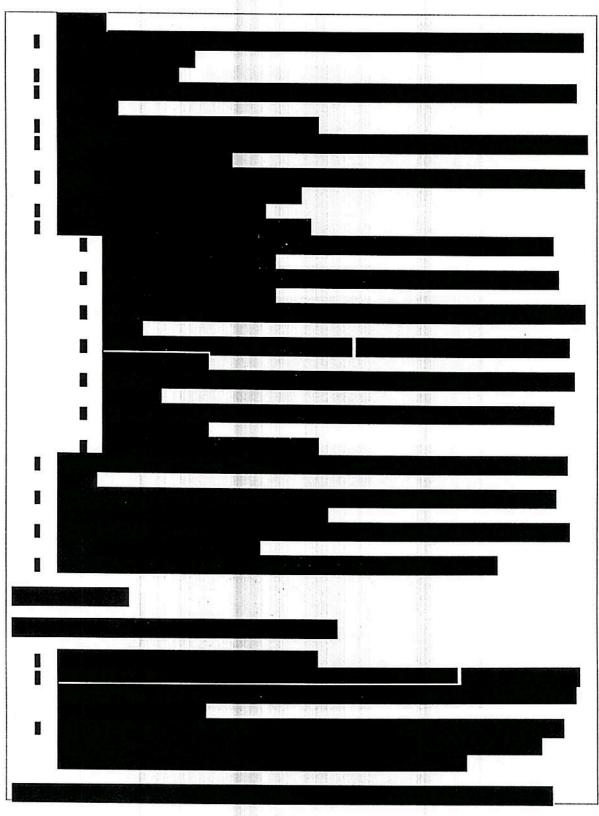




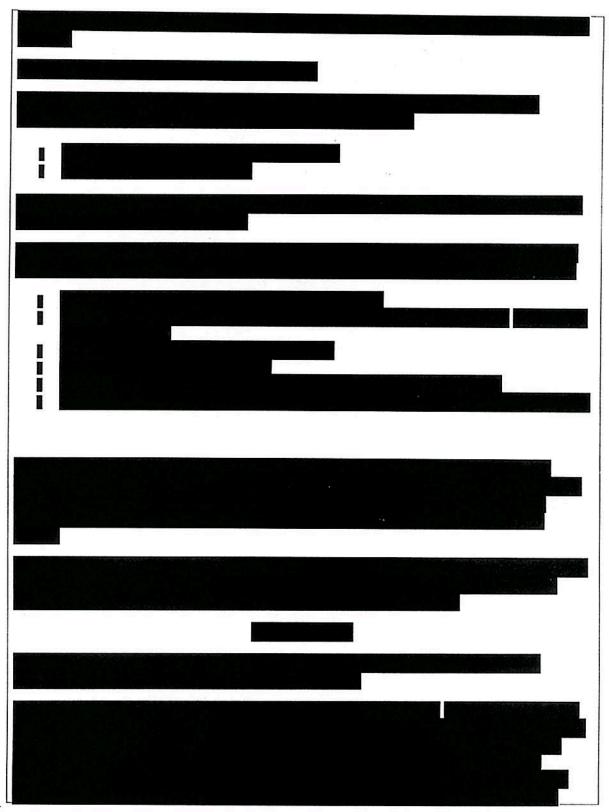




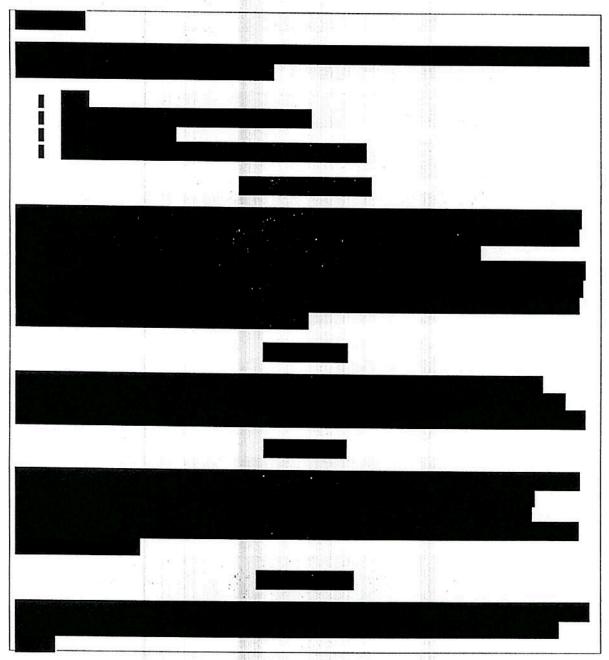












35. Please describe how the Applicant would establish written standard operating procedures to promote good growing and handling practices including requiring that each individual engaged in the cultivation, manufacturing, handling, packaging, and testing of medical cannabis has the training, education, or experience necessary to perform assigned functions. \*

[Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 30% of Commercial Horticulture or Agriculture subsection. Maximum length 2,025 words]



The Applicant is committed to providing employees with training that will enable them to successfully perform assigned functions. The Applicant has nearly three years of experience operating cultivation facilities in Arizona, which includes an extensive employee training program. This program has proven successful, as we are one of only 15 organizations nationwide to earn the Americans for Safe Access Patient Focused Certification, which requires strict adherence to specific standard operating procedures and best practices, and we are in the process of earning a second certification.

#### Instruction

The Cultivation Manager, Brett Saurof, currently leads and supervises employee training at our existing cultivation facility and will continue to do so as the Cultivation Manager of the Maryland facility. Brett has over three years of management experience and has served for one year as Cultivation Manager in the Applicant's existing cultivation facility, where he has:

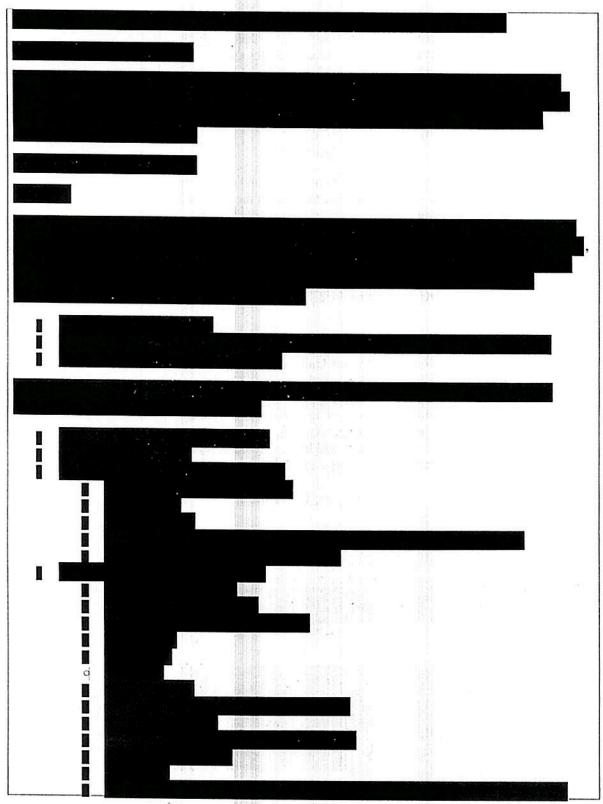
- Assisted in the development of our extensive, 356-page Operations Manual and employee training materials
- Supervised and provided training for all cultivation facility staff, including department managers

Brett will be supported by Gareld Eaton and Adam Silvestri. Gareld holds Bachelor's degrees in Biology and Botany from Northern Arizona University and has served as the Applicant's Director of Cultivation since 2013. Adam, originally from California, has been a cultivator of medical cannabis since 2001. He was also the Head Instructor at Greenway University, where he taught and certified thousands of growers on best practices for cultivating medical cannabis. Training on the cultivation, manufacturing, handling, packaging, and testing of medical cannabis comprises a portion of the training, which will be conducted primarily by Brett with supplemental instruction from Gareld, Adam, and department managers.

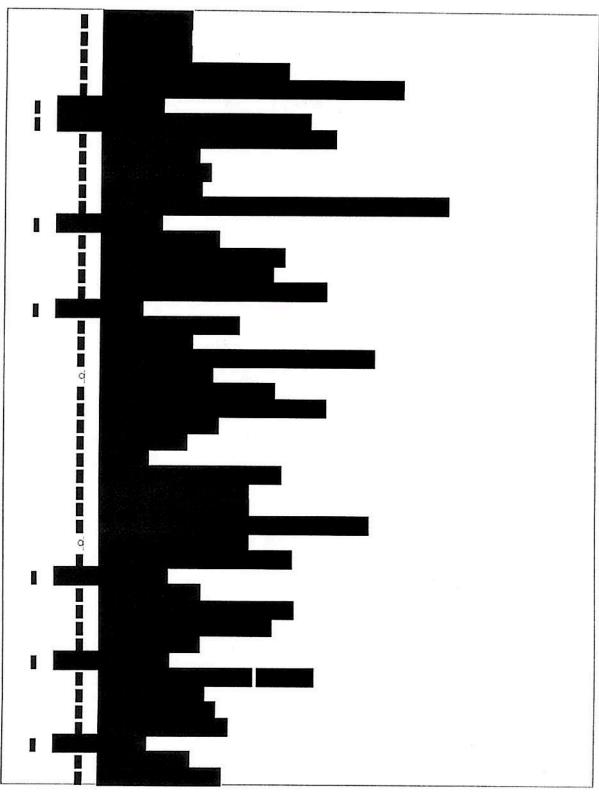
#### Training Curriculum

# Management Training The Applicant provides instruction to the Cultivation Manager and department managers on how to train staff members and ensure consistent comprehension and performance. This training

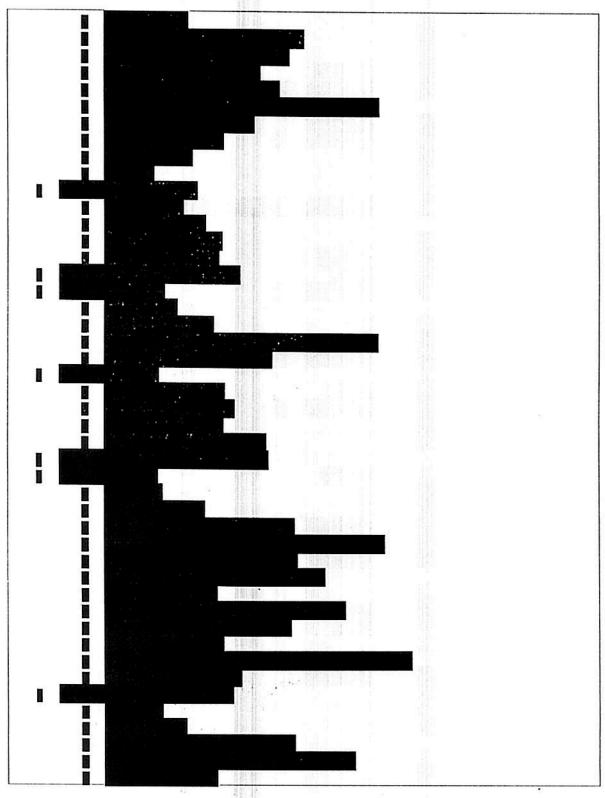




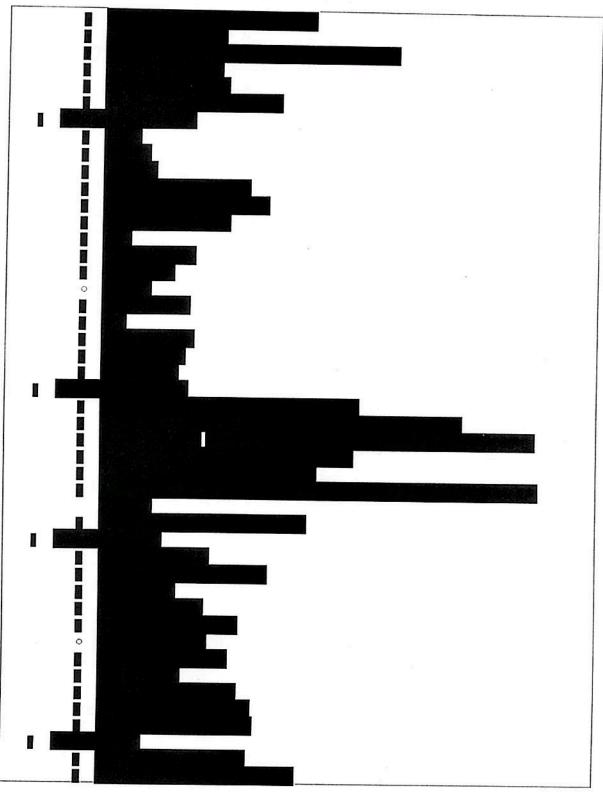




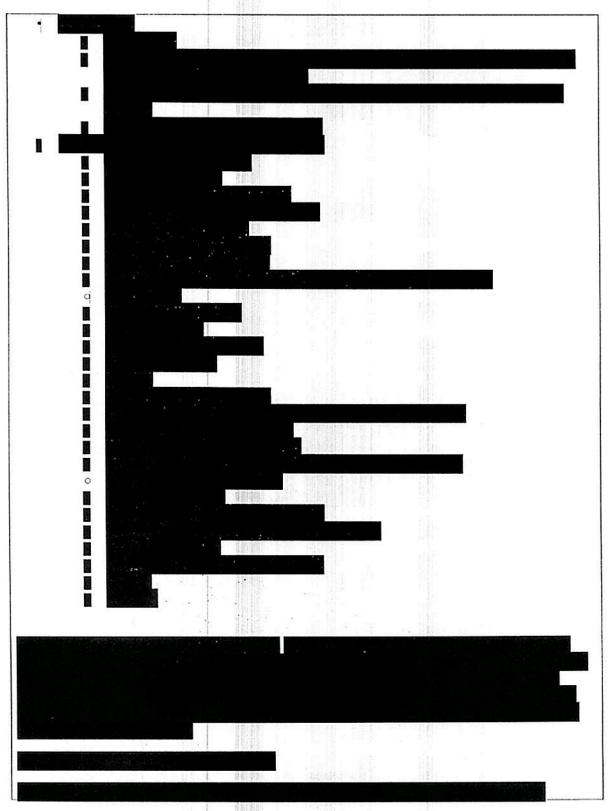




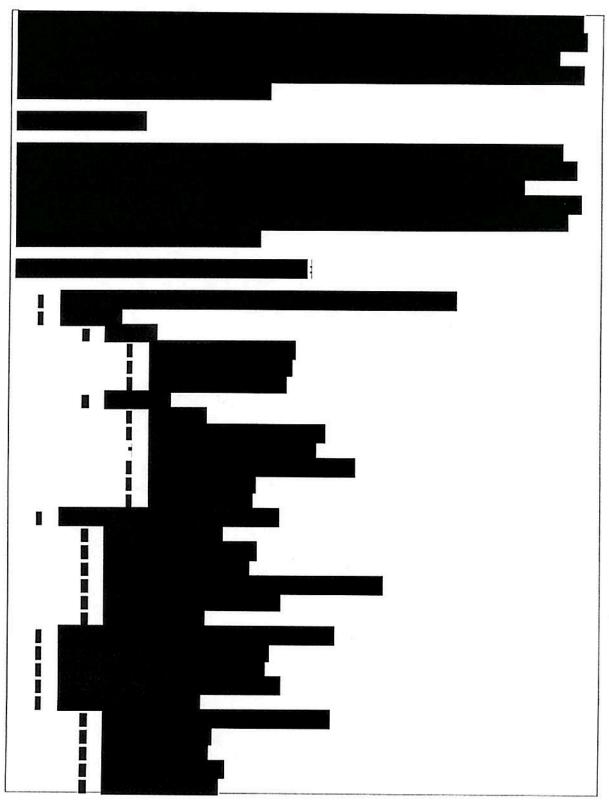




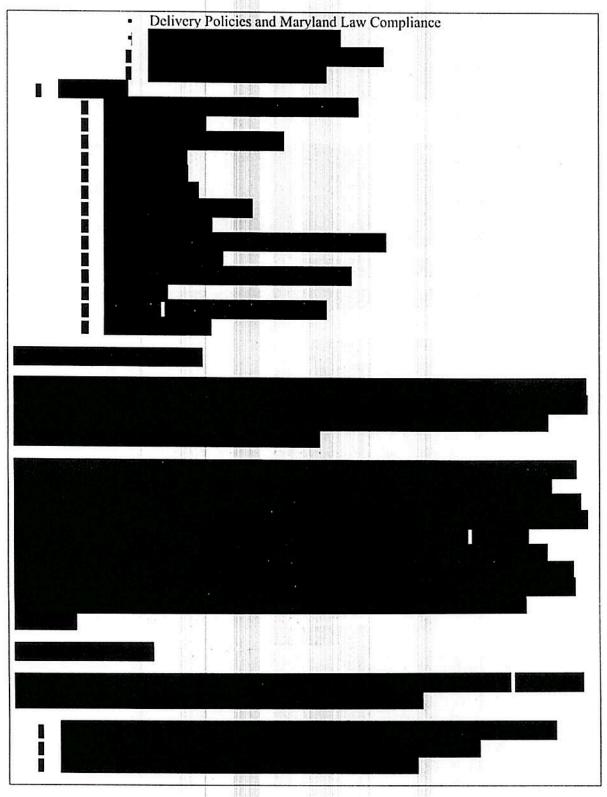














36. Please describe how the Applicant would establish written standard operating procedures to promote good growing and handling practices including requiring that all registered grower agents practice good hygiene and wear protective clothing as necessary to protect the products as well as themselves from exposure to potential contaminants. \* [Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 12.5% of Business and Economic subsection. Maximum length 1,800 words]

The Applicant's goal is to grow high-quality, pharmaceutical grade medical cannabis that provides pain and symptom relief to registered Maryland patients. Over the past three years, we have developed and practice extensive standard operating procedures at our existing cultivation facilities, including procedures for employee hygiene and safety, which have been thoroughly vetted and approved of by the Arizona Department of Health Services, the Nevada Department of Health and Human Services, and Americans for Safe Access. These procedures are outlined below.

Because we will be in the business of cultivating a medical product that will be used by qualifying registered patients with potentially compromised immune systems, training will emphasize employee hygiene protocols and prevention of microbial contamination; cultivation practices that align with ASA/AHPA recommended standards; safe packaging and labeling requirements that protect the integrity and purity of our medical cannabis product; and general safety measures that protect our employees and the community we serve.

### **Employee Hygiene Policies and Protocols**

#### Americans for Safe Access Certification

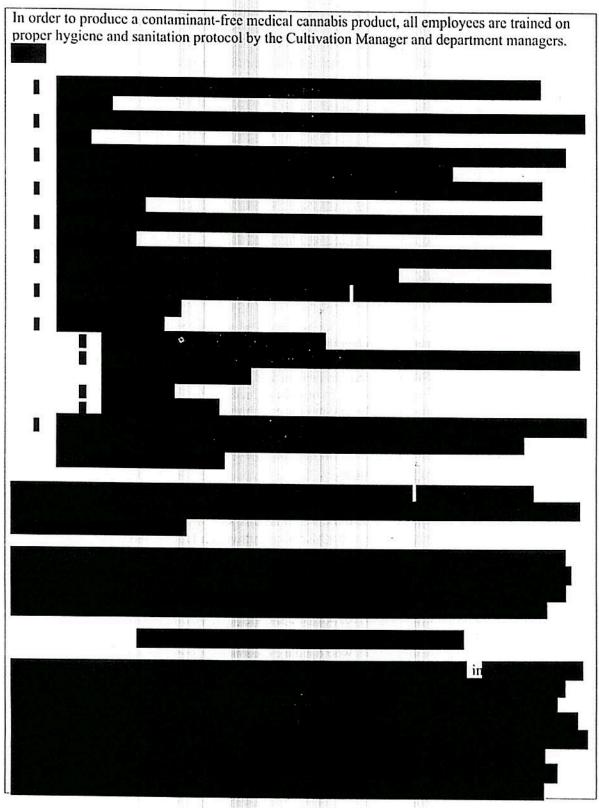
The Applicant is one of only 15 organizations nationwide to have earned the Americans for Safe Access (ASA) Patient Focused Certification, which require strict hygiene protocols and training. We will seek to earn this certification at our Maryland cultivation facility and will adapt our existing policies and procedures to comply with Maryland State regulations. To earn the ASA Patient Focused Certification, cultivation operations must implement, at a

minimum:

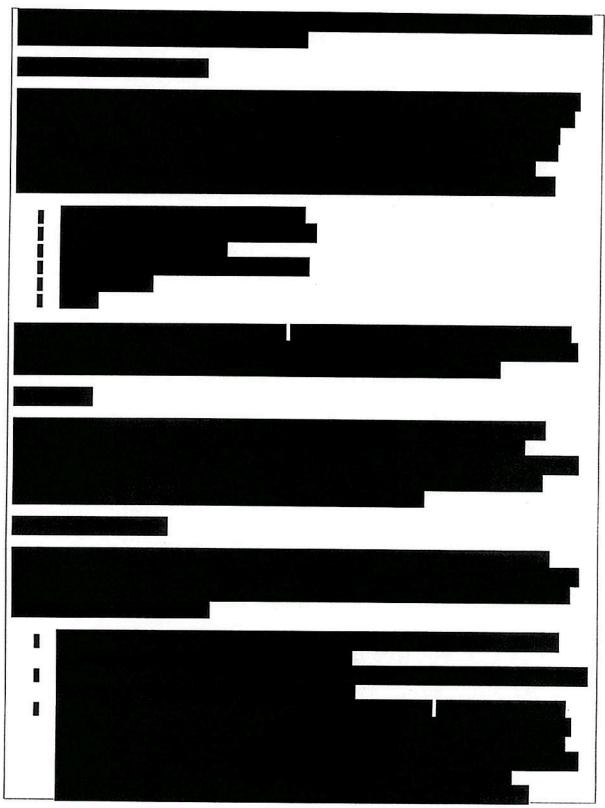
- Policies which prohibit employees who are showing signs of illness, open wounds, sores or skin infections from handling cannabis
- Hygiene training for employees who handle cannabis with specific attention to preventing microbial contamination
- Hand washing requirements including washing hands with soap and hot water before beginning work, after using the bathroom and after meal breaks
- Instructive handwashing signage must be in appropriate areas such as bathrooms, kitchens, and lunch areas, and in multiple languages as needed

## Hygiene Protocol

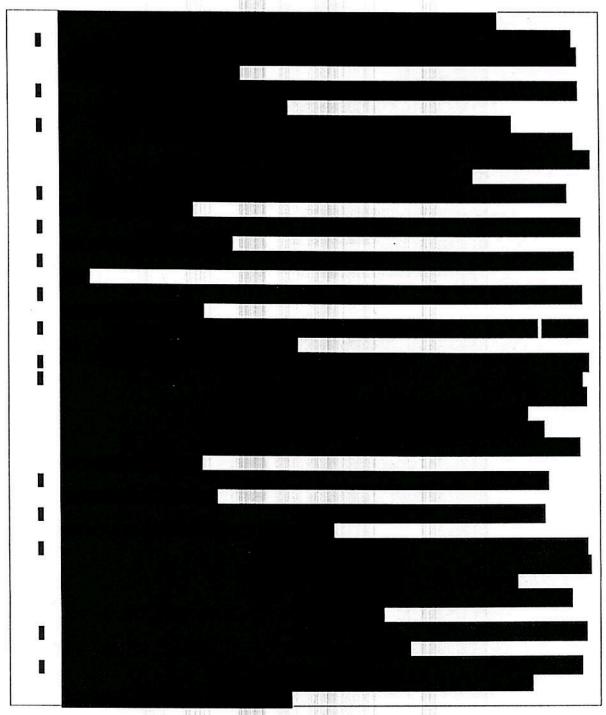












37. Please describe how the Applicant would establish written standard operating procedures to promote good growing and handling practices including requirements for receipt of material, including how the Applicant will quarantine material that is received to be used

## DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



to produce medical cannabis, including a description of the physical location of the quarantine.  $^{\star}$ 

[Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]



38. Please describe how the Applicant would establish written standard operating procedures to promote good growing and handling practices including requirements for receipt of material, including how the Applicant will inspect material for defects, contamination, and compliance with an Applicant's specifications. \*

[Reference 10.62.11.02 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

Upon receipt, materials will be logged into the inventory control system (MJ Freeway) and quarantined in the access-restricted Secure Room to prevent diversion, theft, and loss. The Secure Room will be maintained in a clean and orderly condition free from infestation and contamination.

In order to approve or reject materials received, the Cultivation Manager or department manager will visually inspect contents to determine whether they have deteriorated or been contaminated. S/he will examine the supplier's documentation to ensure the materials are consistent with what was ordered. Materials that meet specifications will be approved and released for use. Shipments not meeting specifications will be rejected, returned, or disposed of per Maryland state and local regulations unless there is an approved treatment to render the material suitable for use and will ensure the product batches will meet all specifications for identity, purity, strength, composition, packaging, and labeling and will not be otherwise contaminated or adulterated. Any such treatment or deviation will be documented.

39. Please describe how the requirement for receipt of material mandating that material may not be released from quarantine until the material (1) passes inspection and (2) is determined to be acceptable for use as intended. \*

(1) [Reference 10.62.11.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

(2) [Reference 10.62.11.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

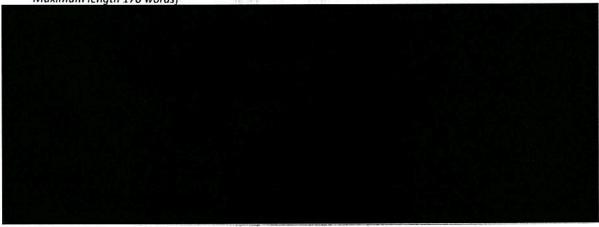


- (1) Upon receipt, materials will be logged into the inventory control system (MJ Freeway) and quarantined in the access-restricted Secure Room to prevent diversion, theft, and loss until the Cultivation Manager or department manager visually inspects the materials for defects, contamination, and compliance. Once the materials pass inspection and meet all specifications for compliance, identity, purity, strength, composition, packaging, and labeling, the materials will be released from quarantine.
- (2) Cultivation management will inspect materials to determine whether they have deteriorated or been contaminated. Materials not meeting specifications will be returned or disposed of per Maryland state and local regulations unless there is an approved treatment to render the materials suitable for use. Materials will be released from quarantine once they have passed inspection and have been determined to be acceptable for the intended use.

#### 10.62.11.03

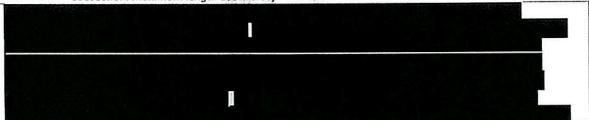
40. Please describe how the Applicant will keep an on-site, a record of water quality testing, and make the record available for inspection. \*

[Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

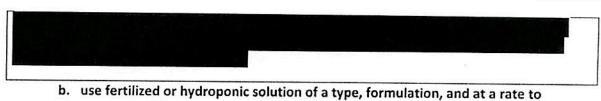


- 41. Please describe how the Applicant, as part of standard operating procedure, will
  - a. adopt a nutrient management plan prepared by a certified management consultant, \*

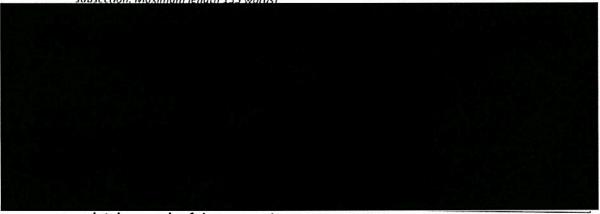
(a) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]







support healthy growth of medical cannabis, and \*
(b) [Reference 10.62.11.03 of the regulations. Graded 0 to 5 scoring. Weighted 1% of Operational subsection. Maximum length 135 words]



 maintain records of the type and amounts of fertilizer and any growth additives used. \*

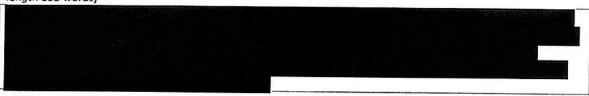
(c) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant will disclose in writing for each batch of medical cannabis distributed to receiving licensed cultivation, processing, or distribution organizations all growth medium amendments, additives, and fertilizers used during the medical cannabis cultivation process. To do so, each day, cultivation facility department managers and registered cultivation agents will record in the Cultivation Log and in our inventory control system, MJ Freeway, any and all actions—including fertigation, which is the application of water and nutrients per the Applicant's nutrient plan—taken on every plant. All nutrients used in the Applicant's cultivation operations will be appropriate for use in food production.

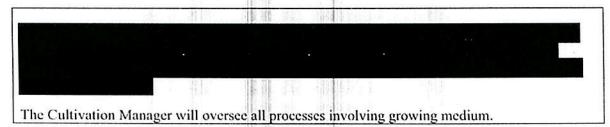


42. Please describe how the Applicant will specify the use of growing media or hydroponic solution in the standard operating procedure. \*

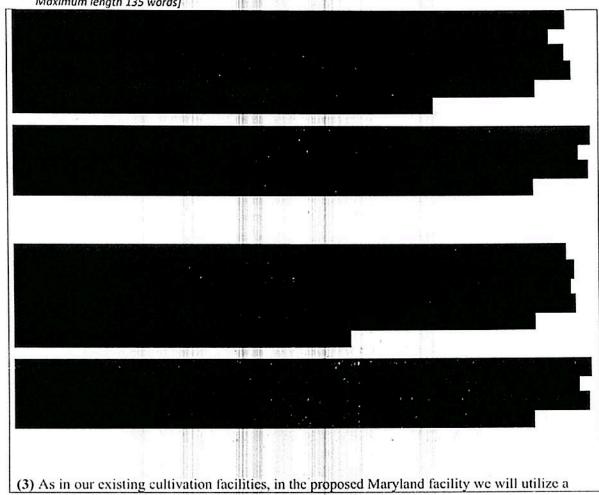
[Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]



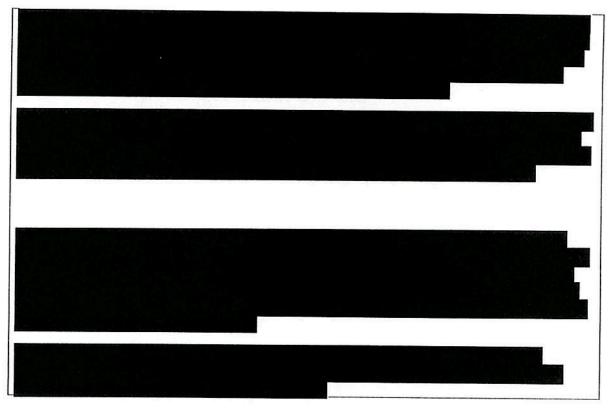




- 43. Please describe how, unless the medical cannabis is field grown, the Applicant will install, as part of the standard operating procedure, a system to monitor, record and regulate (1) temperature, (2) humidity, (3) ventilation, and (4) lighting if needed. \*
  - (1) [Reference 10.62.11.03 of the regulations, Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (2) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (3) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (4) [Reference 10.62.11.03 of the regulations, Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]







44. Please describe how, unless the medical cannabis is field grown, the Applicant will seal or screen the premises ventilation system with a mesh or filtering system fine enough to exclude most plant pests. \*

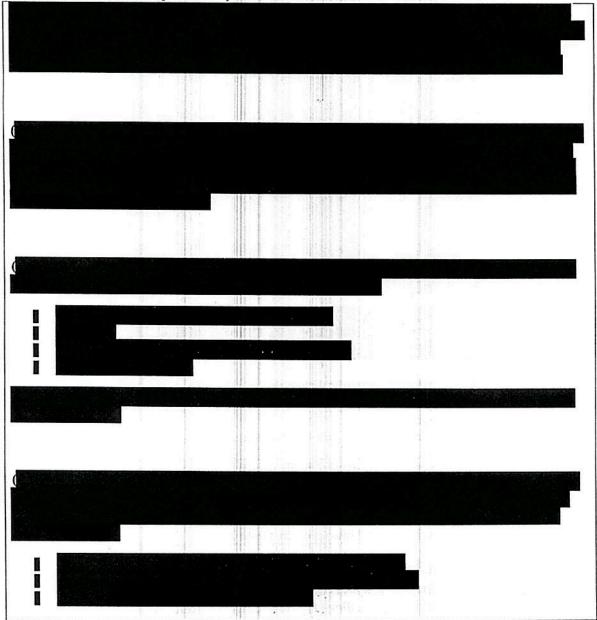
[Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection.



- 45. Please describe how the Applicant will use, as part of the standard operating procedure, integrated pest management practices and techniques to identify and manage plant pathogen and pest problems, including (1) a door control system sufficient to prevent pest entry, (2) regular visual inspection of plants and growing areas for the presence of pests, (3) the use of sticky cards in areas, and (4) identification and recording of all pests or pathogens detected and the measures taken for control. \*
  - (1) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
  - (2) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
  - (3) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]



(4) [Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]



46. Please explain how pesticide applicators and Applications will follow State and federal pesticide requirements for any pesticide applied. \*

[Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

The Cultivation Manager will oversee pesticide application and storage, ensuring cultivation agents uphold and execute proper pest management, pesticide application, and storage as allowed for cannabis application by federal and Maryland laws, rules, and regulations. Department

## DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



managers will retrain agents not following standard operating procedures and take the correct course of action to ensure our medical cannabis is high-quality and free from contaminates.

47. Please explain how sanitation will be in compliance with the Applicant's standard operating procedures. \*

[Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 70 words]

The Cultivation Manager will oversee all sanitation processes, ensuring strict protocol that includes personal hygiene, orderly work areas, and proper placement of equipment and materials to maintain sanitary operation. All contact surfaces, including utensils and equipment, will be cleaned and sanitized—using an EPA-registered sanitizing agent in accordance with labeled instructions—as necessary to prevent contamination. Agents not following standard operating procedures will be retrained to ensure high-quality medical cannabis.

48. Please describe how the Applicant will weigh, document, and destroy all green waste in accordance with the standard operating procedure. \*

[Reference 10.62.11.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

All waste and unusable cannabis products will be weighed and inventoried by two trained and authorized cultivation agents conducting the disposal. The agents will record the reason for disposal including the number of failed or unusable plants, date of disposal, method of disposal, their names and identification numbers, and a certification that the cannabis was properly and completely disposed. Disposal records will be kept for at least five years.

#### 10.62.11.04

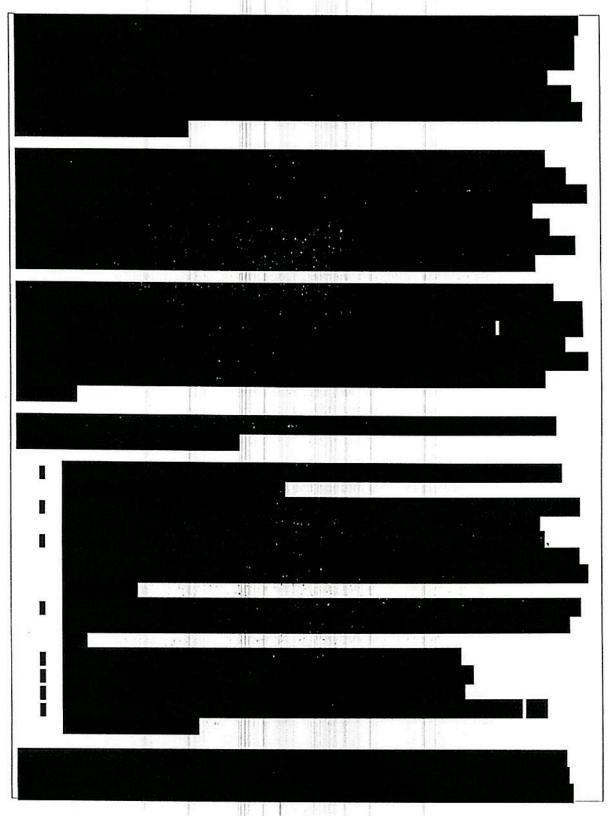
49. Please describe the maintenance method the Applicant will use to prevent contamination of equipment that comes in contact with medical cannabis. \*

[Reference 10.62.11.04 of the regulations. Graded Yes or No. Weighted 5% of Operational subsection. Maximum length 675 words]

The Applicant's mission is to grow and produce high quality medical cannabis that will alleviate suffering in registered Maryland patients. Because we will be in the business of cultivating a medical product that will be used by qualifying registered patients with potentially compromised immune systems, training will emphasize employee hygiene protocols and prevention of microbial contamination that will protect the integrity and purity of our medical cannabis product and the safety of the patients we serve. As such, all registered managers and agents will be thoroughly trained to prevent contamination of equipment that comes in contact with medical cannabis.









## 50. Please describe how the Applicant will maintain cleaning and equipment maintenance logs. \*

[Reference 10.62.11.04 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

The Applicant will utilize a Computerized Maintenance Management System (CMMS) to maintain an information database regarding the organization's equipment and maintenance operations and to track and record equipment cleaning tasks, schedules, and requirements. The Cultivation Manager will be responsible for creating and monitoring the CMMS to inventory all cleaning related aspects of the building and equipment. Department managers will ensure that department-specific records are updated and maintained within the system.

After each cleaning or maintenance activity, the agent will log the activity, including name, date, time, and notes on the activity. Department managers will review this log and inspect the performed activities daily to ensure all cleaning and maintenance activities are conducted on schedule and to a satisfactory level. The Cultivation Manager will review the log weekly and discuss any issues with the department managers.

51. Please describe how the Applicant will have any scale, balance, or other measurement device, and any automatic, mechanical, or electronic equipment, routinely calibrated by a calibration laboratory accredited to International Organization for Standardization (ISO) standard ISO/IEC 17025 by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement. \*

[Reference 10.62.11.04 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant will seek to contract a laboratory that is accredited to International Organization for Standardization standard ISO/IEC 17025 by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. We will use the ILAC website (www.ilac.org) to verify that the accreditation body is indeed signatory to the ILAC and that it employs international consensus standards. Finally, we will contact the accrediting body to verify that they inspected and provided approval for the calibration laboratory.

The Applicant will employ the calibration laboratory to routinely calibrate all scales, balances, or other measurement devices, and any automatic, mechanical, or electronic equipment. A schedule for calibrating this equipment will be created based on standards adopted and recommended by the calibration laboratory. The Applicant will utilize a Computerized Maintenance Management System (CMMS), software that maintains a database of information about the organization's equipment and maintenance operations, to track and record routine calibration and ensure adherence to the calibration schedule.



### 10.62.12.02

52. Please describe how the Applicant will use a perpetual inventory control system that identifies and tracks the Applicant's stock of medical cannabis from the time the medical cannabis is propagated from seed or cutting to the time it is delivered to a licensed dispensary, licensed processor, or a qualifying patient or caregiver. \*

[Reference 10.62.12.02 of the regulations, Graded 0 to 5 scoring. Weighted 2.5% of Production Control

subsection. Maximum length 170 words]

In our existing cultivation operations, we utilize MJ Freeway to identify and track medical cannabis from seed to sale.

Upon propagation, each plant is assigned a unique identifying number and barcoded. From that point forward, everything that happens to the plant will be captured, including genetic history and mother; strain; schedule, including propagation date, vegetative date, flower date, and harvest date; any substance applied to the plant, including nutrients, pesticides, herbicides or fungicides; any labor performed on the plant; and location of plant at all times. Every action is recorded with a date/timestamp and the username of the employee performing the action.

Wholesale sales to other medical marijuana establishments are also tracked through MJ Freeway. The system records the amount, strain, and batch or lot number of the packages being provided, name and registration certificate number of the receiving establishment, and the name and agent registration number of the employee preparing the wholesale order. It also records location and status of packages, such as "in-transit" or "received."

53. Please describe how, in the event of a serious adverse event, an inventory control system will be capable of tracking medical cannabis from a qualifying patient back to the source of medical cannabis. \*

[Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant will use MJ Freeway to track medical cannabis from a qualifying patient back to the source. MJ Freeway is designed specifically for seed to sale inventory tracking. This technology captures all information required to track batches and lots of cannabis and enables tracking for every action performed on a plant or finished cannabis product, every movement of inventory, and every sale, capturing batch and lot numbers throughout and ensuring the security and traceability of inventory at all times.

At the point of sale, a label will be generated from MJ Freeway. The label information will include the business name of the entity that cultivated the medical cannabis, business address, certificate number, date of sale, lot and batch numbers, weight/quantity dispensed, manufacture date and expiration date, list of ingredients, testing results, and appropriate warnings. This information will be permanently stored in the system, and in the event of a serious adverse event, this information will allow for the tracking of the cannabis from the patient to the cannabis source.

54. Please describe how the inventory control system will be designed to promptly identify a discrepancy in the stocks. \*



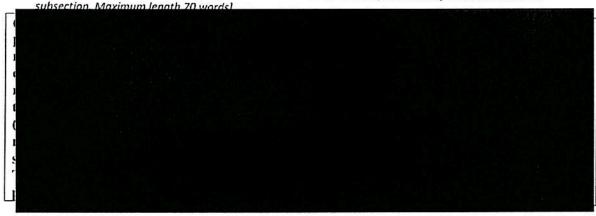
[Reference 10.62.12.02 of the regulations. Graded 0 to 5 scaring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

At our existing cultivation facilities, we use a chain-of-custody system and MJ Freeway to track, identify, and document stock discrepancies. Chain-of-custody protocols are followed any time medicine is transferred between employees, where it is weighed and verified by each employee. Weight loss greater than the amount expected due to handling and moisture loss is reported to the Security Manager. In addition, once weekly, department managers conduct an inventory audit within their department, reconciling the physical inventory with an MJ Freeway inventory report. MJ Freeway enables complete employee and plant inventory tracking, from seed to sale, allowing management to see which employees have handled the product every step of the way.

If a manager identifies an inventory reduction not due to documented causes, s/he will determine where the loss has occurred and take and document corrective action. If the inventory reduction is due to suspected criminal activity by a registered grower, the Security Manager will report the agent to the Commission and to appropriate Maryland state and local law enforcement agencies.

#### 10.62.12.03

- 55. Please describe how, upon receipt of raw material for cultivation, the Applicant will record in the inventory control (1) the date delivered, and (2) the number of cuttings or seeds delivered or the weight of the seeds for each variety in the shipment. \*
  - (1) [Reference 10.62.12.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
  - (2) [Reference 10.62.12.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control



#### 10.62.12.04

- 56. Please describe how as soon as is practical, the Applicant will, for each plant, (1) create a unique identifier for each plant, (2) assign each plant to a batch, (3) enter information regarding the plant into the inventory control system, (4) create a tag with the unique identifier and batch number, and (5) securely attach the tag to a plant container or plant.
  - (1) [Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
  - (2) [Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]



(3) [Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

(4) [Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

(5) [Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

- (1) The Applicant will utilize MJ Freeway to identify and track plants. Upon propagation—by seed or clone—each plant will be assigned a unique identifying number and barcoded with indelible ink that meets US FDA standards. The barcode will be printed on a tamper-evident tag that will be securely affixed to the container until the plant is large enough for the tag to be attached to the plant stalk.
- (2) The Applicant will utilize MJ Freeway to identify and track our plants. Upon propagation—either by seed or clone—each plant will be assigned a unique identifying number as well as a batch code. All cannabis plants that are the same variety and will be grown and exposed to substantially similar conditions throughout cultivation and processing will be assigned to the same batch code.
- (3) The Applicant will utilize MJ Freeway to identify and track plants. Upon propagation—by seed or clone—each plant will be logged into MJ Freeway, including all information regarding the plant, and will be assigned a unique identifying number/batch code printed on a tamper-evident tag that will be securely affixed to the container until the plant is large enough for the tag to be attached to the stalk.
- (4) The Applicant will utilize MJ Freeway to identify and track plants. Upon propagation—by seed or clone—each plant will be assigned a unique identifier and batch number, and barcoded with indelible ink that meets US FDA standards. The barcode will be printed on a tamper-evident tag and securely affixed to the container until the plant is large enough for the tag to be attached to the plant stalk.
- (5) The Applicant will utilize MJ Freeway to identify and track plants. Upon propagation—by seed or clone—each plant will be assigned a unique identifier and batch number, and barcoded with indelible ink that meets US FDA standards. The barcode will be printed on a tamper-evident tag and securely affixed to the container until the plant is large enough for the tag to be attached to the plant stalk.
- 57. Please describe how as soon as is practical, the Applicant will, for each plant, have tags that are indelible and tamper-evident. \*

## DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



[Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

The Applicant will utilize MJ Freeway to identify and track our plants. Upon propagation—either by seed or clone—each plant will be assigned a unique identifying number and barcoded with indelible ink that meets US FDA standards. The barcode will be printed on a tamper-evident tag and securely affixed to the container until the plant is large enough for the tag to be attached to the plant stalk.

58. Please describe how as soon as is practical, the Applicant will, for each plant, have tags that are made of a material that resists variation in temperature and moisture. \*
[Reference 10.62.12.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

Each plant will be assigned and tagged with the unique identifier and batch number upon propagation. The indelible, tamper-evident tag made of a material that resists variation in temperature and moisture will be securely attached to the plant container or plant. From that point forward, everything that happens to the plant will be captured and recorded in the Applicant's inventory control system, MJ Freeway.

#### 10.62.12.05

59. Please describe how, upon completion of curing or drying of each batch, the Applicant will proceed to weigh medical cannabis to update inventory control for the batch. \*
[Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection.
Maximum length 70 words]

Upon completion of curing or drying, an agent will weigh the medical cannabis to update the batch's inventory control. If the agent discerns a discrepancy outside of normal weight loss due to moisture loss or handling, s/he will report the discrepancy to the department manager who will investigate and within one day, if appropriate, report the theft or diversion to the Security Manager, the Commission, and Maryland State Police.

60. Please describe how the Applicant will, at least monthly, conduct a physical inventory of the stock and compare the physical inventory of stock with inventory control. \*

[Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

MJ Freeway enables complete inventory tracking, from seed to sale. Every week, department managers, with oversight from the Inventory Manager, will conduct an inventory audit within their department, reconciling the physical inventory with an MJ Freeway inventory report. A record of each audit will include the date, a summary of the findings, and the names, signatures, and titles of the individuals who conducted the audit.

#### 10.62.12.06

61. Please describe how the Applicant will conduct an investigation of a discrepancy within 1 business day, if the Applicant discerns a discrepancy between the inventory of stock and inventory control outside of normal weight loss due to moisture loss and handling. \*

[Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]



Every week, department managers, with oversight from the Inventory Manager, will conduct an inventory audit within their department. If the weekly inventory audit reveals a discrepancy between the physical inventory and the inventory report produced by the inventory control system (MJ Freeway) that is outside of normal weight loss due to moisture loss and handling, the department manager will commence an investigation of the variance within one business day and will report the variance directly to the Security Manager. Each product will have a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the Agent who executed the transaction. This will allow management to quickly and accurately identify the source of any inventory discrepancy.

- 62. Please describe the process the Applicant will follow in reporting a theft or diversion to the (1) Commission and (2) Maryland State Police within 1 business day. \*
  - (1) [Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
  - (2) [Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 0.5% of Sofety and Security subsection. Maximum length 70 words]
- (1) Every week, department managers, with oversight from the Inventory Manager, will conduct an inventory audit within their department. If the audit reveals a discrepancy that was due to theft or diversion, he or she will notify the Security Manager, who will contact the appropriate individual at the Commission within one business day, via telephone. Records pertaining to the theft/diversion will be made available for review, if necessary.
- (2) Every week, department managers, with oversight from the Inventory Manager, will conduct an inventory audit within their department. If the audit reveals a discrepancy that was due to theft or diversion, he/she will notify the Security Manager, who will contact the appropriate individual at the Maryland State Police Department within one business day, via telephone. Records pertaining to the theft/diversion will be made available for review, if necessary.
- 63. Please describe how the Applicant will, upon discovering a discrepancy and within 30 business days, (1) complete an investigation, (2) amend the Applicant's standard operating procedures, if necessary, and (3) send a report of the audit to the Commission.
  - (1) [Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (2) [Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]
  - (3) [Reference 10.62.12.05 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
- (1) If the weekly inventory audit reveals a discrepancy between the physical inventory and the inventory report produced by the inventory control system (MJ Freeway) that is outside of normal weight loss due to moisture loss and handling, the Security Manager will complete an investigation of the variance within 30 business days.

The inventory control system (MJ Freeway) enables complete employee chain of custody

## DHMH–Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



tracking for inventory, from seed to sale, allowing management to see which employees have handled the product every step of the way. Each product will have a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the Agent who executed the transaction. This will allow us to quickly and accurately identify the source of any inventory discrepancy.

- (2) After the completion of an investigation due to an inventory discrepancy, the Security Manager will review the standard operating procedures. If the inventory variance was found to be a result of inadequate operating procedures, the Security Manager will amend the operating procedures within 30 business days to prevent future discrepancies. The content of the revisions will be dependent upon the circumstances of the discrepancy, but may include:
  - · Further restricting access to areas of the cultivation facility that contain medical cannabis
  - More stringent inventory controls
  - · More frequent inventory audits
  - · New procedures for plant tracking
  - More frequent video surveillance record reviews

If revisions are necessary, the digital and hard copy versions of the operating procedures will be updated. Cultivation facility staff will be immediately informed about and trained on the new operating procedures.

(3) After the completion of an investigation due to an inventory discrepancy, the Security Manager will send a report of the audit to the Commission via email within 30 business days. The record of the audit outlining the discrepancy, called the Loss or Theft Report Form, will include the date, a summary of the findings, and the names, signatures, and titles of the individuals who conducted the investigation.

### 10.62.12.07

64. Please describe how the Applicant shall respond to the return of any medical cannabis from a qualifying patient or a caregiver to be destroyed. \*

[Reference 10.62.12.07 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

The Applicant will destroy returned medical cannabis by following standard operating procedures that comply with all Maryland laws, rules, and regulations and ASA/AHPA standards. Two agents will weigh and inventory the return. They will record the reason for return, date, method of disposal, their names and identification numbers, and a certification that the cannabis was properly and completely disposed. Disposal records will be kept for at least five years.



## 10.62.12.08

65. Please describe how the Applicant will ensure that the Applicant or a registered grower agent thereof will not distribute any medical cannabis to any person if the Licensee or registered grower agent knows, or may have reason to know, that the distribution does not comply with any provision of the Health -General Article, Title 13, Subtitle 33, Annotated Code of Maryland or this subtitle. \*

[Reference 10.62.12.08 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant will ensure that all cultivation agents will not distribute medical cannabis to any person if the Licensee or registered grower agent knows, or may have reason to know, that the distribution does not comply with any and all of Maryland state and local laws, rules, and regulations. To ensure distribution compliance, the Applicant will train all cultivation agents on standard operating procedures that meet or exceed Maryland laws, rules, and regulations as well as ASA/AHPA recommended standards. Cultivation facility management will oversee all aspects of cultivation, packaging, labeling, and distribution and will be responsible for ensuring registered grower agents follow all accepted procedures and protocols. Any and all cultivation agents tasked with cultivation, packaging, labeling, and distribution will be monitored for adherence to the policies and procedures stated above. Medical cannabis that does not comply with any and all provisions of the Health - General Article, Title 13, Subtitle 33, Annotated Code of Maryland or this subtitle will not be distributed by the Applicant or its registered agents.

66. Please describe how the Applicant will insure that Applicant or a registered grower agent thereof will not distribute any medical cannabis to any person if the Licensee or registered grower agent knows, or may have reason to know, that the medical cannabis does not comply with any provision of the Health – General Article, Title 13, Subtitle 33, Annotated Code of Maryland or this subtitle. \*

[Reference 10.62.12.08 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 135 words]

The Applicant will ensure that registered grower agents will not distribute medical cannabis to any person if the Licensee or registered grower agent knows, or may have reason to know, that the medical cannabis does not comply with any provision of the Health – General Article, Title 13, Subtitle 33, Annotated Code of Maryland or this subtitle. To ensure compliance, the Applicant will train all registered grower agents on standard operating procedures that meet or exceed Maryland laws, rules, and regulations as well as ASA/AHPA recommended standards. Cultivation facility management will oversee all aspects of cultivation, packaging, labeling and distribution and will be responsible for ensuring registered grower agents follow all accepted procedures and protocols. Non-compliant medical cannabis will not be distributed.

#### 10.62.13.01

67. Please describe how the Applicant intends to, before shipping an order of products containing medical cannabis, if necessary, repackage the shipment into a container that is (1) constructed of tamper-evident opaque material and (2) sealed with tamper-evident tape. \*

## DHMH-Maryland Medical Cannabis Commission

Application for Medical Cannabis Grower License



(1) [Reference 10.62.13.01 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

(2) [Reference 10.62.13.01 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

(1) Before shipping an order of medical cannabis, the Applicant will package the shipment into a container that is tamper-evident and opaque. We will use containers that meet US FDA packaging requirements, and that include a locking mechanism, temperature control, identification markings, child tampering mechanisms, and certified heat resistant materials, and cannot be accessed without obvious destruction of the seal. Our shipping containers will have appropriate external tracking identification but otherwise be non-descript concerning the nature of the internal content.

As part of the overall security strategy the Applicant will routinely change, update, and alter packaging and sealing methods of medical cannabis inventory to ensure that protection measures remain proactive, forward leaning, and frequently inspected. All methods will comply with Maryland and local laws, rules, and regulations as well as ASA/AHPA recommended standards.

(2) After properly packaging an order of medical cannabis, the Applicant will seal the container with tamper-evident tape that meets U.S. Food and Drug Administration packaging requirements. Our tamper-evident tape will provide a visual indication of package integrity and will be accompanied by an appropriate precautionary label that describes the tamper-evident features(s) and warns that absence of or damage to the tape could indicate product tampering. As part of the overall security strategy the Applicant will routinely change, update, and alter packaging and sealing methods of medicinal cannabis inventory to ensure that protection measures remain proactive, forward leaning, and frequently inspected. All methods will comply with Maryland and local laws, rules, and regulations as well as ASA/AHPA recommended standards.

68. Please describe how the Applicant would ship multiple packages that are being shipped to the same recipient within one large opaque tamper-evident container. \* [Reference 10.62.13.01 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection.

Maximum length 135 words]

All medical cannabis products will be appropriately weighed, labeled, and packaged in accordance with the inventory control procedures, Maryland laws, rules, and regulations, as well as ASA/AHPA standards. Preparation of medical cannabis for transportation, including packaging multiple packages for shipment into one large container to the same recipient, will be completed using Two Person Integrity (TPI) procedures to protect against loss or diversion. We will use opaque, tamper-resistant containers that meet US FDA packaging requirements, and that include a locking mechanism, temperature control, identification markings, child tampering mechanisms, and certified heat resistant materials, and cannot be accessed without obvious destruction of the seal. All of the Applicant's shipping containers will have appropriate external tracking identification but otherwise be non-descript concerning the nature of the internal content.



### 10.62.13.02

- 69. Please describe how the Applicant will label each package in a shipment of products containing cannabis with (1) the date and time of the sealing of the package for shipment, (2) the name and signature of the registered grower agent, registered processor agent, or registered dispensary agent who prepared the package and sealed the package, (3) the name and address of the shipping Licensee, (4) the shipment identification number, (5) A description, including the weight, of each item, contained in the package, and (6) the name and address of the Licensee, or other party if applicable, to receive the shipment. \*

  (1) [Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (2) [Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (3) [Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (4) [Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (5) [Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (6) [Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
- (1) As part of the packaging process, Packaging and Transportation Department agents will appropriately weigh and label all medical cannabis products in accordance with the inventory control procedures, Maryland state and local laws, rules, and regulations as well as ASA/AHPA recommended standards. These labels will include the date and time of the sealing of the package for shipment. Preparation of medical cannabis for shipping will be completed using Two Person Integrity (TPI) procedures to prevent loss or diversion, and packaging labels will be double-checked for accuracy before transportation.

Secure records of all labels generated by the inventory control system will be retained on file at the cultivation facility and backed up at a secure offsite facility for a minimum of five years.

(2) As part of the packaging process, Packaging and Transportation Department agents will appropriately weigh and label all medical cannabis products in accordance with the inventory control procedures, Maryland state and local laws, rules, and regulations as well as ASA/AHPA recommended standards. These labels will include the name and signature of the registered cultivation agents who prepared and sealed the package. Preparation of medical cannabis for shipping will be completed using Two Person Integrity (TPI) procedures to prevent loss or diversion, and packaging labels will be double-checked for accuracy before transportation.

Secure records of all labels generated by the inventory control system will be retained on file at the cultivation facility and backed up at a secure offsite facility for a minimum of five years.

(3) As part of the packaging process, Packaging and Transportation Department agents will



appropriately weigh and label all medical cannabis products in accordance with the inventory control procedures, Maryland state and local laws, rules, and regulations as well as ASA/AHPA recommended standards. These labels will include the name and address of the shipping Licensee. Preparation of medical cannabis for shipping will be completed using Two Person Integrity (TPI) procedures to prevent loss or diversion, and packaging labels will be double-checked for accuracy before transportation.

Secure records of all labels generated by the inventory control system will be retained on file at the cultivation facility and backed up at a secure offsite facility for a minimum of five years.

(4) As part of the packaging process, Packaging and Transportation Department agents will appropriately weigh and label all medical cannabis products in accordance with the inventory control procedures, Maryland state and local laws, rules, and regulations as well as ASA/AHPA recommended standards. These labels will include the name and signature of the shipping identification number. Preparation of medical cannabis for shipping will be completed using Two Person Integrity (TPI) procedures to prevent loss or diversion, and packaging labels will be double-checked for accuracy before transportation.

Secure records of all labels generated by the inventory control system will be retained on file at the cultivation facility and backed up at a secure offsite facility for a minimum of five years.

(5) As part of the packaging process, Packaging and Transportation Department agents will appropriately weigh and label all medical cannabis products in accordance with the inventory control procedures, Maryland state and local laws, rules, and regulations as well as ASA/AHPA recommended standards. These labels will include a description, including the weight, of each item, contained in the package. Preparation of medical cannabis for shipping will be completed using the standard procedures to prevent loss or diversion, and packaging labels will be double-checked for accuracy before transportation.

Secure records of all labels generated by the inventory control system will be retained on file at the cultivation facility and backed up at a secure offsite facility for a minimum of five years.

(6) As part of the packaging process, Packaging and Transportation Department agents will appropriately weigh and label all medical cannabis products in accordance with the inventory control procedures, Maryland state and local laws, rules, and regulations as well as ASA/AHPA recommended standards. These labels will include the name and address of the Licensee, or other party if applicable, to receive the shipment. Preparation of medical cannabis for shipping will be completed using procedures to prevent loss or diversion, and packaging labels will be double-checked for accuracy before transportation.

Secure records of all labels generated by the inventory control system will be retained on file at

		Ĥ	
a <sup>2</sup>			



the cultivation facility and backed up at a secure offsite facility for a minimum of five years.

## 70. Please describe how the labels will be made of weather resistant and tamper-evident materials. \*

[Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

The Applicant will use tamper-evident, tamper-resistant, and weather-resistant security labels to protect the integrity of our medical cannabis and to guard against theft and diversion. The labels we will use will stay affixed despite extreme temperatures, excessive moisture or dryness; they will not be able to be removed without leaving behind evidence; and they will not be able to be resealed.

As part of the overall security strategy the Applicant will routinely change, update, and alter packaging and sealing methods of medicinal cannabis inventory to ensure that protection measures remain proactive, forward leaning, and frequently inspected. All methods will comply with Maryland and local laws, rules, and regulations as well as ASA/AHPA recommended standards.

# 71. Please describe how the labels will be conspicuously placed on a package. \* [Reference 10.62.13.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

During the packaging process employees will affix labels in a conspicuous location on the outside of the packaging. Preparation of medical cannabis for shipping will be completed using procedures to prevent loss or diversion, and labels will be double-checked for accuracy before transportation.

All packages shipped from the cultivation facility will meet US FDA packaging requirements. If necessary, we will use shipping containers to ship multiple packages to the same recipient, which will have appropriate external tracking identification but otherwise be non-descript.

As part of the overall security strategy the Applicant will routinely change, update, and alter packaging and scaling methods to ensure that protection measures remain proactive, forward leaning, and frequently inspected. All methods will comply with Maryland and local laws, rules, and regulations as well as ASA/AHPA recommended standards.

#### 10.62.15.01

72. Please describe how the Applicant will ensure to cultivate each plant and produce each batch of medical cannabis in conformity with the standard operating procedures. \* [Reference 10.62.15.01 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant has nearly three years of experience ensuring every plant and batch of medical cannabis is cultivated according to standard operating procedures (SOPs) at our existing cultivation facilities, which meet or exceed ASA/AHPA recommended standards.

Application for Medical Cannabis Grower License



The first step in producing consistent, quality medical cannabis is to train all employees to ensure they have the knowledge and skills to perform their required job functions. The Cultivation Manager and department managers train employees upon initial hire, during weekly staff meetings, as needed, and after annual evaluations.

Department managers are responsible for ensuring employees within their departments uphold and execute SOPs including proper growing protocols, disease and pest management, pesticide application and storage, product safety, hygiene and sanitation protocols, inventory tracking, and quality control. Extensive record keeping ensures conformity with SOPs. Department managers retrain any agents not following standard operating procedures to ensure medical cannabis is high quality, free from contaminates, and in compliance with Maryland state and local rules and regulations as well as ASA/AHPA recommended standards.

- 73. Please describe how the Applicant will record the cultivation process in accordance to standard operating procedures to ensure (1) consistency of the batch with the variety and (2) accuracy of the day-to-day production. \*
  - (1) [Reference 10.62.15.01 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]
  - (2) [Reference 10.62.15.01 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]
- (1) To ensure consistency of each batch with its variety, the Applicant's employees will input daily information regarding all aspects of the cultivation process into the inventory control system (MJ Freeway) including, but not limited to:
  - Seed germination
  - Cloning
  - Watering and feeding, including fertilizer regimens
  - Lighting, temperature, and humidity adjustments
  - Harvesting and curing

Cultivation facility department managers will oversee cultivation reporting and will ensure batch consistency.

- (2) To ensure consistency and accuracy of day-to-day cultivation production, the Applicant's registered agents will input daily information regarding the entire cultivation operation into the inventory control system (MJ Freeway) including, but not limited to:
  - · Seed germination
  - Cloning
  - · Watering and feeding, including fertilizer regimens
  - · Lighting, temperature, and humidity adjustments
  - Harvest and curing

Cultivation Facility department managers will oversee cultivation reporting and will ensure day-to-day production accuracy.



74. Please describe how the Applicant will record any deviation defined as a material change from the standard operating procedure which would impact the quality of the batch in the log. \*

[Reference 10.62.15.01 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant's registered grower agents will record into the Cultivation Log and into the inventory control system (MJ Freeway) any and all deviations that are a material change from standard operating procedures and that would impact the quality of the batch.

Deviations may occur in any and all stages of the cultivation process and will be documented by registered cultivation agents as appropriate in the Cloning, Nursery, Vegetation, Flowering, Harvesting, Drying, and Curing rooms. Deviations may occur during seed germination, cloning, watering and feeding (fertigation), and may involve agent error, materials and equipment misuse and/or failure, lighting, temperature, and humidity adjustments.

Cultivation facility department managers will oversee cultivation reporting and ensure that all deviations affecting medical cannabis quality are recorded. They will ensure that registered cultivation agents uphold all standard operating procedures and comply with Good Agricultural Practices, Maryland state and local laws, rules, and regulations, as well as ASA/AHPA recommended standards.

All cultivation reports, including deviation reporting, will be securely stored and saved for a minimum of five years.

- 75. Please describe how the Applicant will not release any batch of medical cannabis if there was any deviation in production of the batch from the standard operating procedure unless (1) after independent testing of the batch in accordance with the criteria set forth in Regulation .04 of this chapter the batch is tested by an independent testing laboratory and the Licensee determines, as a result of such testing, that the batch meets the specification for the variety and (2) the determination is recorded. \*
  - (1) [Reference 10.62.15.01 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]
  - (2) [Reference 10.62.15.01 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
- (1) Any batch of medical cannabis subject to any deviation in production of the batch from the standard operating procedures will be segregated in the Secure Room and will labeled with a sign reading "DO NOT DISTRIBUTE." The Applicant will not release this segregated medical cannabis unless the Licensee determines, as a result of independent testing pursuant to COMAR 10.62.15.04, that the batch meets specification for the variety.



(2) Any batch of medical cannabis subject to deviation in production from the standard operating procedures will be segregated in the Secure Room and will labeled with a sign reading "DO NOT DISTRIBUTE." The Applicant will not release this medical cannabis unless the Licensee determines, as a result of independent testing pursuant to COMAR 10.62.15.04, that the batch meets specification for the variety and that determination is recorded.

### 10.62.15.02

76. Please describe how the Applicant will, during the process of cultivation, regularly inspect each plant to ensure proper growth and absence of pests and disease. \*

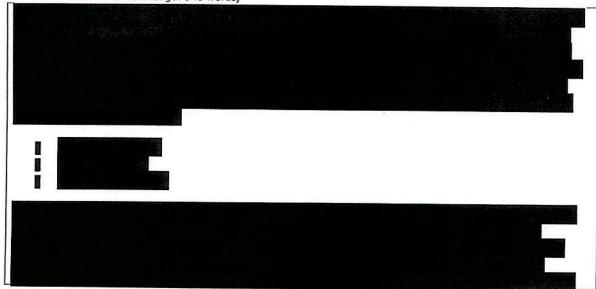
[Reference 10.62.15.02 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

All cultivation facility staff will be trained by the Cultivation Manager and his/her department manager on proper methods of plant inspection and pest/disease detection. Staff will visually inspect all seedlings, clones, vegetative plants, and flowering plants on a daily basis. Visual tests will first be performed with the naked eye. Upon discovery of any suspicious circumstance or substance (e.g., mold, mildew, or insects), cultivation facility staff will view the plant material using a magnification loupe, leaving the plant material untouched. If the presence of contaminants is detected through the loupe magnifier, a portion of the affected plant tissue (roots, stalk, leaf, flower) will be removed and further inspected under high power magnification and/or a microscope. If contaminants are confirmed, the test sample shall be destroyed. Cultivation facility staff will revisit the location from which the sample was taken and identify the severity of the issue, again using close visual inspection and magnifying devices. Any and all affected plant material will be removed and destroyed and the Cultivation Manager notified.

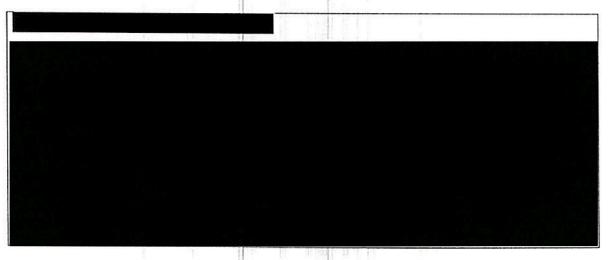
#### 10.62.15.03

77. Please describe how the Applicant will hold medical cannabis in secure, segregated storage until released for distribution. \*

[Reference 10.62.15.03 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]







### 10.62.15.04

78. Please describe how the Applicant will select and utilize an independent testing laboratory that has adopted a standard operating procedure to test medical cannabis and medical cannabis concentrate that is approved by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. \*

[Reference 10.62.15.04 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant will utilize a multi-step process for selecting an independent testing laboratory. First, we will seek out testing laboratories that have adopted standard operating procedures to test medical cannabis and medical cannabis concentrate that are approved by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. Next, we will use the ILAC website (<a href="www.ilac.org">www.ilac.org</a>) to verify that the accreditation body is indeed signatory to the ILAC and that it employs international consensus standards (ISO/IEC 17025) for laboratories. Finally, we will contact the accrediting body to verify that they inspected and provided approval for the testing laboratory.

In addition to the steps above, the Applicant will utilize existing relationships with Americans for Safe Access (ASA) certified testing laboratories in other states to assist with testing laboratory selection in Maryland. As soon as possible, the Applicant will utilize a Maryland independent testing laboratory that has earned the ASA Patient Focused Certification.

79. Please describe how the Applicant will select and utilize an independent testing laboratory to obtain samples of each batch according to a statistically valid sampling method by an agent of an independent testing laboratory. \*

[Reference 10.62.15.04 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

When a batch of medical cannabis is ready for testing, a designated cultivation facility agent will contact a representative of the independent testing laboratory to collect samples for testing. Prior to the arrival of the laboratory representative, the agent will homogenize the medical cannabis by mixing together the entire batch of cannabis in a single container. Because the potency of

Application for Medical Cannabis Grower License



medical cannabis flower varies according to the part of the plant on which it grew, which in turn affects the test results, homogenization provides a uniform population of cannabis from which to select testing samples. The container of homogenized medical cannabis will be stored in the Secure Room until the arrival of the laboratory representative. Upon arrival, the representative of the independent testing laboratory will, using gloves, randomly select a samples of sufficient size from the container of homogenized cannabis to produce reliable test results (typically two to five grams).

80. Please describe how the Applicant will utilize the independent lab to analyze the samples according to (1) the most current version of the cannabis inflorescence monograph published by the American Herbal Pharmacopeia (AHP); or (2) a scientifically valid methodology that is equal or superior to that of the AHP monograph. \*

[Reference 10.62.15.04 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]

The Applicant will utilize an independent testing laboratory approved by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation Mutual Recognition Arrangement to sample according to a statistically valid sampling method and analyze the medical cannabis samples according to the most current version of the cannabis inflorescence monograph published by American Herbal Pharmacopeia (AHP) or a scientifically valid methodology equal or superior to the AHP monograph.

81. Please describe how the Applicant will assure the laboratory is following their standard operating procedure to confirm or refute the original result in the event of a test result which falls out of specification. \*

[Reference 10.62.15.04 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]

Because the laboratory is an independent organization, we will not be in a position to assure standard operating procedures (SOPs) are followed to confirm/refute the original result if a test result falls out of specification. However, as we do in other states, we will:

- Review laboratory SOPs to ensure proper testing protocol
- Periodically employ a second laboratory, for comparison

....

Test multiple samples of the same product to ensure consistent testing

## 82. Please describe how the Applicant will interact with the laboratory to issue a certificate of analysis. \*

[Reference 10.62.15.04 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

The Applicant will establish an arrangement with the testing laboratory to issue a certificate of analysis for each batch of tested medical cannabis to the Cultivation Manager via email. In our experience in other states, test results are typically available within 48 hours. In the event that there is a delay or concern with the certificate of analysis, the Cultivation Manager will contact the testing laboratory via email or telephone.



83. Please describe how the Applicant will interact with the laboratory to destroy the remains of the sample of medical cannabis after analysis is completed. \*

[Reference 10.62.15.04 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]

The Applicant will contract an independent testing laboratory to collect a random sample of medical cannabis sufficient to conduct initial and stability testing. If necessary, additional samples will be provided from Applicant storage. Upon completion of all initial and stability testing, the Cultivation Manager will give the independent testing laboratory authority to destroy the remains of the sample of medical cannabis, if any remains.

### 10.62.15.05

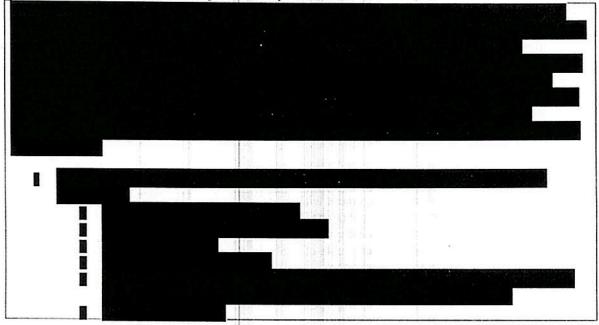
84. Please describe how the Applicant will interact with an independent testing laboratory to issue a certificate of analysis for each batch, with supporting data, to report. \*

[Reference 10.62.15.05 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]

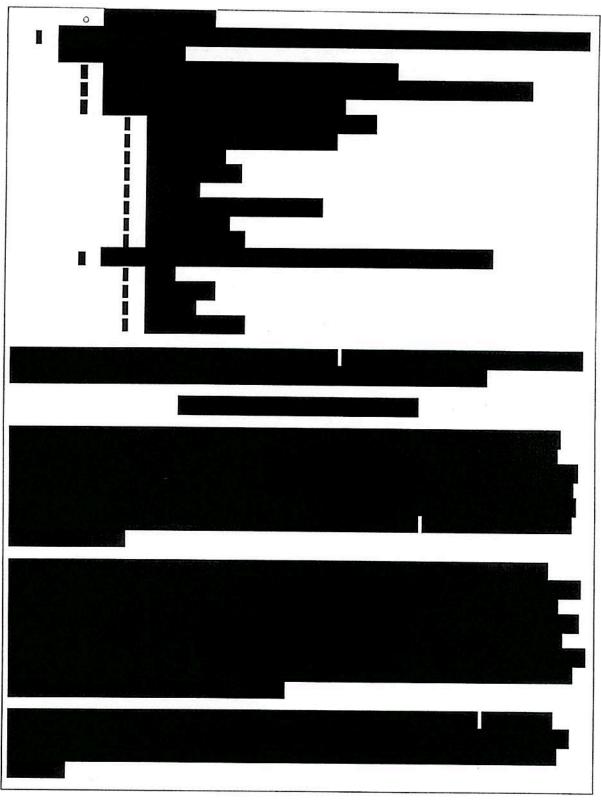
The Applicant will establish an arrangement with the testing laboratory to issue a certificate of analysis for each batch of tested medical cannabis to the Cultivation Manager via email. In our experience in other states, test results are typically available within 48 hours. In the event that there is a delay or concern with the certificate of analysis, the Cultivation Manager will contact the testing laboratory via email or telephone.

### 10.62.15.06

- 85. Please describe how the Applicant will, upon review of the certificate of analysis and determination that a batch meets the specification for the variety,
  - a. assign an expiration date to the batch, \*
    (a) [Reference 10.62.15.06 of the regulations. Graded 0 to 5 scoring. Weighted 5% of Operational subsection. Maximum length 675 words]









### b. release the batch for distribution, and \*

(b) [Reference 10.62.15.06 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

Upon review of the certificate of analysis and determination that a batch meets the specification for the variety, the Cultivation Manager will release the batch for distribution. At that time, the Applicant's registered agents will weigh, inventory, and account for, on video, all medical cannabis to be distributed. The process will be logged into MJ Freeway, the Applicant's inventory control system. Each packaging invoice will contain the quantity of product by variety, price per unit of each product, product documentation on each variety shipped with laboratory testing results, the name of the registered agent who prepared and packaged the items being delivered, the name and address of both cultivation facility and the licensed receiving organization, as well as any additional information required by the Commission.

### c. revise the status of the batch in the inventory control. \*

(c) [Reference 10.62.15.06 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

Upon review of the certificate of analysis and determination that a batch meets the specification for the variety, the Cultivation Manager will release the batch for distribution. At that time, the Applicant's registered agents will weigh, inventory, and account for, on video, all medical cannabis to be transported, and log the process into MJ Freeway, the Applicant's inventory control system.

86. Please describe how the Applicant will, upon receipt of test results that do not meet specifications, if they so choose, rework or reprocess the batch according to their standard operating procedure. Then describe how the reworked or reprocessed batch will be resampled and retested by the independent testing laboratory to ensure that all required specifications are met. \*

[Reference 10.62.15.06 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant's mission is to cultivate quality medical cannabis for registered Maryland patients. If a batch of our medical cannabis does not meet required specifications, we will rework or destroy the batch per standard operating procedures.

If a cannabis sample does not pass the microbiological, mycotoxin, pesticide chemical residue, or heavy metals tests, the following procedures will be followed:

- If the sample failed the pesticide chemical residue or heavy metals test, the entire batch from which the sample was taken will be destroyed in accordance with Maryland state and local rules and regulations
- If the sample failed any other test, the batch may be used to make a CO, or solvent-based extract, as such processing destroys these contaminants

Before releasing any reworked batch, the Applicant will have an independent testing laboratory

Application for Medical Cannabis Grower License



resample and retest the reworked batch. We will only release for distribution medical cannabis that has passed standards set by Maryland state and local rules and regulations and has been properly certified by a licensed independent testing laboratory.

87. Please describe how the Applicant will retain every certificate of analysis. \*

[Reference 10.62.15.06 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection.

Maximum length 70 words]

Hard copies of each certificate of analysis obtained from an independent testing laboratory will be stored in a locked filing cabinet in the Cultivation Manager's office. In addition, digital copies of all certificates of analysis will be stored on-site on the password-protected computer located in the Cultivation Manager's office and at the off-site by the records management company. Certificates of analysis will be retained for a minimum of five years.

#### 10.62.15.07

- 88. Please describe how the Applicant will provide a sample from each released batch to an independent testing laboratory sufficient to perform stability testing at 6-month intervals to (1) Ensure product potency and purity (2) Provide support for expiration dating. \*

  (1) [Reference 10.62.15.07 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]

  (2) [Reference 10.62.15.07 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]
- (1) The Applicant will provide a sample from each released batch for stability testing at 6-month intervals to ensure product potency and purity by segregating all harvested cannabis into homogenized batches in accordance with standards set forth by the laboratory and Cultivation Facility to ensure a random, homogenized sample. The laboratory will select a random sample sufficient in size to produce reliable test results for stability testing.
- (2) The Applicant will utilize test results from the independent licensed testing laboratory in order to determine if the released batch has maintained standards of purity, potency, and strain profile and still supports the product expiration date. Batches that no longer pass potency and purity standards will be immediately recalled according to the Applicant's standard operating procedures, Maryland laws, rules, and regulations as well as ASA/AHPA guidelines.
- 89. Please describe how the Applicant will retain a sample from each released batch (1) sufficient to provide for follow-up testing if necessary, (2) properly store the sample for one year past the date of expiration of the batch. \*
  - (1) [Reference 10.62.15.07 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]
  - (2) [Reference 10.62.15.07 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]
- (1) To retain a sample from each released batch sufficient for follow-up testing, a designated cultivation facility agent will:
  - Segregate all harvested cannabis of a each cultivar into homogenized batches to ensure a



random sample draw

- Select from each batch a random sample of a size sufficient to produce reliable test results for potential follow-up testing (typically two to five gram) by the designated independent testing laboratory
- (2) The samples retained for potential follow-up laboratory testing will each be stored in individual, opaque, air-tight containers each labeled with the strain name, the date the samples were collected, and the initial test results. The samples will be stored in a designated area of the climate controlled Secure Room for one year past the expiration date of the batch.

### 10.62.15.08

90. Please describe how the Applicant will submit a list of the products and their specifications that the Licensee offered for distribution in the previous quarter to the Commission on a quarterly basis. \*

[Reference 10.62.15.08 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

On the first of the month following the end of a calendar quarter, the Applicant's Inventory Manager will review inventory distribution reports from MJ Freeway, the Applicant's inventory control and management system. The inventory distribution reports will list all medical cannabis products and their specifications that the Applicant offered for distribution during the previous quarter. The Inventory Manager will review the reports for accuracy, compare the information against cultivation and testing logs as well as the quarter's shipping manifests. S/he will correct and report any discrepancies to the Commission and Applicant executive management. S/he will submit the inventory distribution reports to the Commission and make all supporting documentation available to the Commission upon request. The inventory distribution reports will be securely retained for at least five years.

#### 10.62.17.01

91. Please describe how the Applicant, as a member of one of the following - a licensed grower, licensed processor, licensed dispensary, certifying physician, and the Commission-shall establish a procedure to receive, organize, store and respond to all oral, written, electronic or other complaints regarding medical cannabis and adverse events. \*

[Reference 10.62.17.01 of the regulations. Graded 0 to 5 scoring. Weighted 1% of Production Control subsection. Maximum length 70 words]

The Applicant will establish a dedicated telephone number and email address to receive all complaints regarding medical cannabis and adverse events. These lines of communication will be monitored by the Inventory Manager, who will review and evaluate complaints, recall products as necessary, reimburse, store, and dispose of recalled products per cultivation facility standard operating procedures, which comply with Commission and Maryland state and local rules and regulations.



### 10.62.17.02

- 92. Please describe how the Applicant will, in the event a complaint associated with a serious adverse event, promptly report the complaint to, (1) the Commission, (2) either the licensed grower from which the medical cannabis originated, or the licensed processor from which the medical cannabis concentrate originated, (3) the certifying physician caring for the qualifying patient. \*
  - (1) [Reference 10.62.17.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
  - (2) [Reference 10.62.17.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
  - (3) [Reference 10.62.17.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]
- (1) In the event the Applicant receives a complaint of a serious adverse event associated with a batch of distributed medical cannabis, the Inventory Manager will immediately email the Commission to report the complaint and to inform the Commission of the Applicant's response. If the Commission doesn't respond within 24 hours, the Inventory Manager will call the Commission and speak with the person or department handling adverse events and recalls.
- (2) If the event the Applicant receives a complaint of a serious adverse event associated with a batch of distributed cannabis, in addition to informing the Commission, the Inventory Manager will inform any and all licensed processing, cultivation, and dispensing organizations that may also have received the Applicant's medical cannabis that has been associated with the complaint.
- (3) If the Applicant receives a dispensary license in addition to the cultivation license and has distributed medical cannabis directly to patients, and if the Applicant receives a complaint of a serious adverse event associated with a batch of medical cannabis it has distributed, the Inventory Manager will inform all certifying physicians caring for all qualifying patients who have received medical cannabis associated with the adverse event.

### 10.62.17.03

93. Whenever a complaint regarding the quality or safety of medical cannabis is received by a licensed grower, licensed processor or licensed dispensary, a Licensee shall, within 24 hours, review the complaint to determine if it is substantive or reports a serious adverse event. Please describe the process that the Applicant will complete for the above review.

Reference 10.62.17.03 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

Upon receiving a complaint regarding the quality or safety of medical cannabis, the Inventory Manager will review the complaint within 24 hours to determine if it reports a serious adverse event. S/he will use the U.S. FDA's definition of a serious adverse event. The complaint will be deemed substantive if the:

Application for Medical Cannabis Grower License



- Patient was at substantial risk of dying or continued use of the medical cannabis might have resulted in death
- Patient was admitted to a hospital or had a prolongation of hospitalization as a result of the adverse event
- Adverse event resulted in substantial disruption of normal life functions
- Exposure to the medical cannabis prior to conception or during pregnancy may have resulted in an adverse outcome in the child
- Medical or surgical intervention was necessary to preclude permanent impairment of a body function, or prevent permanent damage to a body structure
- Event doesn't fit the other outcomes, but may jeopardize patient and/or require medical/surgical treatment to prevent one of the other outcomes
- 94. If the Applicant determines that a complaint is substantive or reports a serious adverse event, please describe how the Applicant will promptly determine the batch number or lot number of the medical cannabis, the medical cannabis finished product, and medical cannabis concentrate that is the subject of the complaint. \*

[Reference 10.62.17.03 of the regulations. Graded 0 to 5 scoring. Weighted 1% of Production Control subsection. Maximum length 70 words]

All medical cannabis distributions will be labeled with a batch/lot number. Upon receiving a complaint, the Inventory Manager will request the batch/lot number of the medical cannabis that is the subject of the complaint. If the batch/lot number is unknown, the Inventory Manager will create and review an inventory report using available data inputs such as recipient and date of sale. Using that information s/he will determine the batch number.

- 95. If the Applicant determines that a complaint is substantive or reports a serious adverse event, please describe how the Applicant will investigate the record and circumstances of the production of the batch and lot to determine
  - a. if there was a deviation from the standard operating procedure in the production of the medical cannabis by reviewing production logs, \*

    (a) [Reference 10.62.17.03 of the regulations. Graded Yes or No. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

If the Applicant determines a complaint is substantive or reports a serious adverse event, the Inventory Manager and department managers will review cultivation logs as well as all daily actions on the batch in question that were recorded by registered cultivation agents in MJ Freeway, the Applicant's inventory control system. The managers will carefully investigate the record and production of the batch and lot to determine if there was a deviation from the standard operating procedure in the production of the medical cannabis. The managers will review inputs from all phases of cultivation, including but not limited to: propagation, culturing, hardening off, soil and/or soilless medium mixing and disinfecting, potting and transplanting, vegetation, flowering, pest control, watering, fertilization, monitoring, trimming, drying, curing, packaging and labeling, and transportation. The managers will also interview registered cultivation agents to learn as much as possible about that particular batch's cultivation, drying, curing, packaging and labeling, and transporting process. In addition, the managers will review facility maintenance, service, and sanitation logs.

Application for Medical Cannabis Grower License



b. if the sample meets specification by submitting parts of the retention samples of the batch and lot to an independent testing laboratory. \* (b) [Reference 10.62.17.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production

Control subsection. Maximum length 70 words]

The Inventory Manager will submit parts of the batch and lot's retention samples to an independent testing laboratory to determine if the medical cannabis meets specifications and passess all tests for the variety. Batches not passing potency or purity standards for the strain in question will be recalled according to the Applicant's standard operating procedures, Maryland laws, rules, and regulations, as well as ASA/AHPA guidelines.

- 96. If sample analysis of a batch or lot with reported complaints reveals that the batch or lot fails to meet specification, please describe how the Applicant will (1) order a recall of all products derived from or included in the batch or lot, (2) notify all patients, caregivers, and dispensaries who may have obtained medical cannabis products from such a batch or lot of the recall, and (3) offer and pay reimbursement for any returned medical cannabis.
  - (1) [Reference 10.62.17.03 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words)
  - (2) [Reference 10.62.17.03 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]
  - (3) [Reference 10.62.17.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words)
- (1) If the Inventory Manager learns that sample analysis of a batch/lot with reported complaints reveals the batch/lot fails to meet specifications, s/he will order a complete recall of all products derived from or included in batch/lot within 24 hours. S/he will initiate the recall by notifying all affected receiving organizations, requesting they remove affected products from distribution, and informing them of protocols for returning product.
- (2) Within 24 hours of becoming aware that a product recall is necessary, the Inventory Manager will send a "Recall Letter" to each recipient of the affected product. The Recall Letter will include a complete description of the Recalled Product; codes used to identify the Recalled Product; a copy or image of the Recalled Product's label; an identification of the Recalled Product's problem and any potential health hazard(s); and instructions to immediately remove Recalled Product from further distribution. The letter will also instruct the recipient to return any recalled product to the cultivation facility for destruction. The letter will also include instructions that, if the Direct Recipient has distributed the Recalled Product, the Direct Recipient must notify the Direct Recipient's customers of the recall and copy the contracted disposal company on any such notification.

Forty-eight hours after Recall Letters have been mailed, we will telephone any Direct Recipient who has not responded as directed to ensure that notification has been received.

(3) Within 24 hours of becoming aware that a recall is necessary, the Inventory Manager will

Application for Medical Cannabis Grower License



initiate the recall by informing all affected receiving organizations of recalled product codes, the recalled product's problem and resultant potential health hazards, instructions to immediately remove the recalled cannabis from distribution, instructions on how to return the medical cannabis, and how to collect a full reimbursement from the Applicant for the recalled medical cannabis.

- 97. In a case of a report of a serious adverse event or a substantive complaint, if the investigation reveals a deviation from the standard operating procedure in the production of the batch or lot, please describe how the Applicant would
  - a. order a recall of all products derived from or included in the batch or lot, \*

    (a) [Reference 10.62.17.03 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

The Applicant's recall procedures will be as follows:

- Department managers will gather information collected in the tracking process: inventory management system records, customer database records, and incident report(s)
- The Inventory Manager will retain and segregate all recalled products in our control, adhering a DO NOT DISTRIBUTE sign and completing the Recall Log component of the Incident Log
- The Inventory Manager will send a Recall Letter to affected customers
- The Inventory Manager will notify the Commission, law enforcement, and the media within twenty-four hours providing them with:
  - Name and Product Code of recalled product(s)
  - Production date(s) of the recalled product(s)
  - o Reason for the recall
  - Quantity of withdraw/recalled product(s) distributed
- The Inventory Manager will coordinate and monitor the recovery of all affected product(s) with the assistance of the department managers
- The Inventory Manager will reconcile the total quantity of recalled product and affected product in inventory against the total quantity produced
  - notify all patients, caregivers, and dispensaries who may have obtained medical cannabis products from such a batch or lot of the recall, and \*

     (b) [Reference 10.62.17.03 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

Within 24 hours of becoming aware that a product recall is necessary, the Inventory Manager will send a "Recall Letter" to each recipient of the affected product. The Recall Letter will include a complete description of the Recalled Product; codes used to identify the Recalled Product; a copy or image of the Recalled Product's label; an identification of the Recalled Product's problem and any potential health hazard(s); and instructions to immediately remove Recalled Product from further distribution. The letter will instruct the recipient to contact the contracted disposal company for further direction regarding retrieval of Recalled Product. The letter will also include instructions that, if the Direct Recipient has distributed Recalled Product, the Direct Recipient must notify the Direct Recipient's customers of the recall and copy contracted disposal company on any such notification.



Forty-eight hours after Recall Letters have been mailed, we will telephone any Direct Recipient who has not responded as directed to ensure that notification has been received.

c. offer and pay reimbursement for any returned medical cannabis. \*
(c) [Reference 10.62.17.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

Within 24 hours of becoming aware that a product recall is necessary, the Applicant will send a written "Recall Letter" to each recipient of the affected product that includes--in addition to information described in Question 97b--the Applicant's reimbursement offer and instructions on how the qualifying patient can claim reimbursement for any and all returned medical cannabis.

#### 10.62.17.04

98. Please describe how the Applicant will develop a procedure to ensure medical cannabis that is recalled is stored and segregated until disposal of recalled material is authorized by the Commission. \*

[Reference 10.62.17.04 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Production Control subsection. Maximum length 170 words]

Recalled medical cannabis and medical cannabis products will be stored and segregated as follows:

- The Inventory Manager will retain and segregate all medical cannabis to be recalled and still in our control in the secure, climate-controlled Secure Room
- The Inventory Manager will mark each unit of received Recalled Product in a
  conspicuous location (not covering any batch, lot, serial, or other control numbers) with a
  red or orange rectangular label bearing the following message: "RECALLED
  PRODUCT—DO NOT USE OR DISTRIBUTE"
- Upon receipt of Recalled Product from establishments to which it was originally distributed, the Inventory Manager will catalog all batch and lot numbers of received Recalled Product
- Recalled products will be isolated from all other products to prevent potential crosscontamination and ensure recalled products are not mistakenly redistributed
- All labeled, segregated Recalled Product will be stored in the climate-controlled Secure Room until the Commission authorizes disposal of the recalled medical cannabis material, which will be disposed of per standard operating procedures
- 99. Please describe how, within 24 hours of the receipt of notice from the Commission that the disposal of recalled medical cannabis is authorized, the Applicant will dispose of the recalled medical cannabis according to the standard operating procedure. \*

[Reference 10.62.17.04 of the regulations. Graded Yes or No. Weighted 1% of Production Control subsection. Maximum length 70 words]

Within 24 hours of the receipt of notice from the Commission that the disposal of recalled medical cannabis is authorized, the Applicant will dispose of the recalled medical cannabis according to the standard operating procedure by rendering the medical cannabis as unusable by grinding the product and incorporating the waste with non-consumable solid waste or other ground material so the resulting mixture is at least 50% non-cannabis waste by volume.



#### 10.62.18.04

100. Please describe how the Applicant will install an electronic manifest system to record the chain of custody for the shipment of products containing medical cannabis. \*

[Reference 10.62.18.04 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

The Applicant will use MJ Freeway's electronic manifest system to record the chain of custody for the shipment of medical cannabis products. The electronic manifest will record:

- Name and address of the shipping licensee
- · Shipping licensee's shipment identification number
- Weight and description of each individual package that is part of the shipment, and the total number of individual packages
- Name of the registered grower agent(s) who prepared the shipment
- Name and address of the receiving licensee or other receiving party if applicable
- · Any handling or storage instructions

A copy of the manifest will be carried by the delivery team and will be available for review before, during, and after transport. Shipping manifests will be retained on file at the cultivation facility for a minimum of five years.

- 101. Please describe how the Applicant will ensure that the electronic manifest system shall include a chain of custody that records (1) the name and address of the shipping Licensee, (2) the shipping Licensee's shipment identification number (3) the weight and description of each individual package that is part of the shipment, and the total number of individual packages, (4) the name of the registered grower agent or registered dispensary agent that prepared the shipment, (5) the name and address of the receiving Licensee or other receiving party if applicable, and (6) any handling or storage instructions. \*
  - (1) [Reference 10.62.18.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (2) [Reference 10.62.18.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (3) [Reference 10.62.18.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (4) [Reference 10.62.18.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (5) [Reference 10.62.18.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
  - (6) [Reference 10.62.18.02 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]
- (1) The Packaging and Transportation Manager will be responsible for ensuring that the transportation agent completely and accurately fills out an electronic manifest before loading or transporting any and all medical cannabis scheduled to leave the cultivation facility. The electronic shipping manifest will include the name and address of the shipping Licensee. After the manifest information is correct and complete, the transportation agent will forward the manifest to the Packaging and Transportation Manager, who will compare the manifest against



orders and the packaging log. If accepted, the Packaging and Transportation Manager will sign and approve the manifest and return the approved manifest to the transportation agent who will proceed with the order. If the manifest is rejected, the Packaging and Transportation Manager will investigate the issue and take appropriate corrective action.

(2) The Packaging and Transportation Manager will be responsible for ensuring that the transportation agent completely and accurately fills out an electronic manifest before loading or transporting any and all medical cannabis scheduled to leave the cultivation facility. The electronic shipping manifest will include the shipping Licensee's shipment identification number.

After the manifest information is correct and complete, the transportation agent will forward the manifest to the Packaging and Transportation Manager, who will compare the manifest against orders and the packaging log. If accepted, the Packaging and Transportation Manager will sign and approve the manifest and return the approved manifest to the transportation agent who will proceed with the order. If the manifest is rejected, the Packaging and Transportation Manager will investigate the issue and take appropriate corrective action.

(3) The Packaging and Transportation Manager is responsible for ensuring the transportation agent completely and accurately completes an electronic manifest before loading or transporting medical cannabis scheduled to leave the facility. The electronic shipping manifest will include the weight and description of each individual package that is part of the shipment, and the total number of individual packages.

After the manifest information is correct and complete, the transportation agent will forward the manifest to the Packaging and Transportation Manager, who will compare the manifest against orders and the packaging log. If accepted, the Packaging and Transportation Manager will sign and approve the manifest and return it to the transportation agent, who will proceed with the order. If the manifest is rejected, the Packaging and Transportation Manager will investigate the issue and take appropriate corrective action.

(4) The Packaging and Transportation Manager is responsible for ensuring that the transportation agent completely and accurately completes an electronic manifest before loading or transporting any and all medical cannabis scheduled to leave the facility. The electronic shipping manifest will include the name of the registered grower agent or registered dispensary agent that prepared the shipment.

After the manifest information is correct and complete, the transportation agent will forward the manifest to the Packaging and Transportation Manager, who will compare the manifest against orders and the packaging log. If accepted, the Packaging and Transportation Manager will sign and approve the manifest and return the approved manifest to the transportation agent who will



proceed with the order. If the manifest is rejected, the Packaging and Transportation Manager will investigate the issue and take appropriate corrective action.

(5) The Packaging and Transportation Manager is responsible for ensuring that the transportation agent completely and accurately completes an electronic manifest before loading or transporting any and all medical cannabis scheduled to leave the facility. The electronic shipping manifest will include the name and address of the receiving Licensee or other receiving party if applicable.

After the manifest information is correct and complete, the transportation agent will forward the manifest to the Packaging and Transportation Manager, who will compare the manifest against orders and the packaging log. If accepted, the Packaging and Transportation Manager will sign and approve the manifest and return the approved manifest to the transportation agent who will proceed with the order. If the manifest is rejected, the Packaging and Transportation Manager will investigate the issue and take appropriate corrective action.

(6) The Packaging and Transportation Manager is responsible for ensuring that the transportation agent completely and accurately completes an electronic manifest before loading or transporting any and all medical cannabis scheduled to leave the facility. The electronic shipping manifest will include any handling or storage instructions.

After the manifest information is correct and complete, the transportation agent will forward the manifest to the Packaging and Transportation Manager, who will compare the manifest against orders and the packaging log. If accepted, the Packaging and Transportation Manager will sign and approve the manifest and return the approved manifest to the transportation agent who will proceed with the order. If the manifest is rejected, the Packaging and Transportation Manager will investigate the issue and take appropriate corrective action.

#### 10.62.18.03

102. Please describe how the Applicant will assure that an electronic manifest shall be created by the shipping Licensee for each shipment of products containing cannabis. \*

[Reference 10.62.18.03 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]

Before any medical cannabis is shipped from the cultivation facility, the transportation agent will complete an electronic manifest and submit it to the Packaging and Transportation Manager for approval. The Manager will oversee all loading of medical cannabis vehicles and will check that an electronic manifest has been completed and approved before allowing the medical cannabis to be loaded or to leave the facility.

103. Please describe how the Applicant will assure that the electronic manifest shall contain, at a minimum, the following entries as a chain of custody, in the order listed (1) An entry by the registered grower agent or registered dispensary agent who has prepared the



shipment, including the date and time of preparation; (2) An entry by a shipping Licensee's transportation agent, of the date and time of the placement of the shipment into the medical cannabis transport vehicle; (3) An entry by Licensee's agent receiving the shipment including the date and time of the acceptance; (4) If any other person had custody or control of the shipment, that person's identity, the circumstances, duration, and disposition. \*

- (1) [Reference 10.62.18.03 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
- (2) [Reference 10.62.18.03 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
- (3) [Reference 10.62.18.03 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
- (4) [Reference 10.62.18.03 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
- (1) The Packaging and Transportation Manager will review all electronic manifests to ensure each contains, at a minimum, the required chain of custody entries in the order listed pursuant to COMAR 10.62.18.03. All entries will be date- and time-stamped by the electronic manifest system. The first will be: An entry by the registered agent who has prepared the shipment, including the date and time of preparation.
- (2) The Packaging and Transportation Manager will review all electronic manifests to ensure each contains the required chain of custody entries in the order listed pursuant to COMAR 10.62.18.03. All entries will be date- and time-stamped by the electronic manifest system. The second will be: An entry by a shipping Licensee's transportation agent, of the date and time of the placement of the shipment into the medical cannabis transport vehicle.
- (3) The Packaging and Transportation Manager will review all electronic manifests to ensure each contains, at a minimum, the required chain of custody entries in the order listed pursuant to COMAR 10.62.18.03. All entries will be date and time-stamped by the electronic manifest system. The third will be: An entry by Licensee's agent receiving the shipment including the date and time of the acceptance.
- (4) The Packaging and Transportation Manager will review all electronic manifests to ensure each contains, at a minimum, the required chain of custody entries in the order listed pursuant to COMAR 10.62.18.03. All entries will be date and time-stamped by the electronic manifest system. The fourth entry will be: If any other person had custody or control of the shipment, that person's identity, the circumstances, duration, and disposition.



#### 10.62.18.04

104. Please describe how the Applicant will assure that a transportation agent driving a medical cannabis transport vehicle shall have a current driver's license. \*

[Reference 10.62.18.04 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]

Before clearing a transportation agent to drive a medical cannabis transport vehicle, the Packaging and Transportation Manager will check that the agent has a current driver's license issued by the state of Maryland. The Packaging and Transportation Manager will take an image of the agent's driver's license, which s/he will save in a security department file stored in a password-protected computer and backup according to file storage protocol.

105. Please describe how the Applicant will assure that while on duty, a transportation agent will not wear any clothing or symbols that may indicate ownership or possession of cannabis. \*

[Reference 10.62.18.04 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

The Packaging and Transportation Manager and Cultivation Manager will train all transportation agents. During training, transportation agents will agree to the Applicant's dress code for transportation staff, which states that transportation agents will not wear any clothing or symbols while on duty that indicate ownership or possession of cannabis.

The Packaging and Transportation Manager will oversee medical cannabis loading before transport. At that time, and again before the transportation agent leaves the facility, the Manager will make sure the transportation agent is dressed according to company protocol and is not wearing any clothing or symbols that indicate ownership or possession of cannabis. If necessary, the Manager will ask the transportation agent to change into allowable clothing. The transportation agent will not be permitted to transport medical cannabis until s/he is dressed according to company protocol.

#### 10.62.18.05

106. Please describe how the Applicant will assure that either a secure transportation company or a shipping Licensee shall transport products containing medical cannabis. \* [Reference 10.62.18.05 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]

The Applicant will employ one trained transportation agent with a current driver's license to drive our medical cannabis transport vehicle, accompany shipment of products containing medical cannabis, and ensure that the product is secured at all times during transport. While on duty, the Applicant's transportation agent will not wear any clothing or symbols that may indicate ownership or possession of cannabis.

The transportation agent will carry identification approved by the Commission and drive a medical cannabis transport vehicle displaying a current Maryland registration, that is insured as required by law, and does not display any sign or illustration related to medical cannabis or a Licensee.



The Applicant will install an electronic manifest system to record the chain of custody for the shipment of products containing medical cannabis. Each shipping manifest will be created for each shipment of products containing cannabis and will record:

- · The name and address of the shipping licensee
- · The shipping licensee's shipment identification number
- The weight and description of each individual package that is part of the shipment, and the total number of individual packages
- The name of the registered cultivation agent or registered dispensary agent that prepared the shipment
- The name and address of the receiving licensee or other receiving party, if applicable
- Any handling or storage instructions

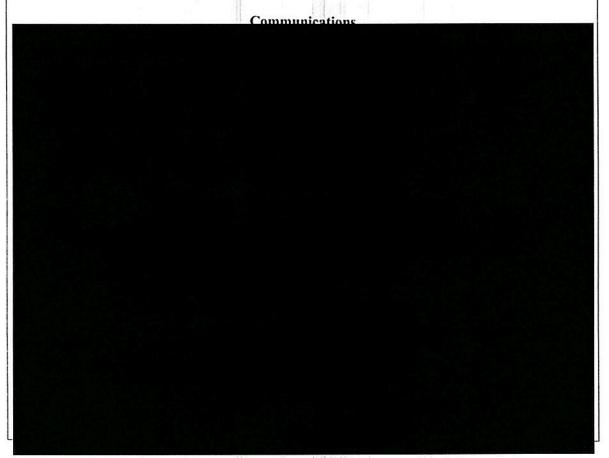
Each electronic manifest will contain, at a minimum, the following entries as a chain of custody, in the order listed:

- An entry by the registered cultivation agent or registered dispensary agent who has
  prepared the shipment, including the date and time of preparation
- An entry by a shipping licensee's transportation agent of the date and time of the placement of the shipment into the medical cannabis transport vehicle
- An entry by licensee's agent receiving the shipment including the date and time of the acceptance
- If any other person had custody or control of the shipment, that person's identity, the circumstances, duration, and disposition
- 107. Please describe how the Applicant will ensure that a shipping Licensee shall use one transportation agent, who shall carry identification approved by the Commission, to (1) accompany shipment of products containing medical cannabis, and (2) ensure that the product is secured at all times during transport. \*
  - (1) [Reference 10.62.18.05 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]
  - (2) [Reference 10.62.18.05 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]
- (1) The Packaging and Transportation Manager trains transportation agents on state and local rules and regulations regarding the transportation of medical cannabis, as well as the Applicant's transportation protocol, which emphasizes the safe and secure transport of all medical cannabis. The Packaging and Transportation Manager will ensure that a trained transportation agent carrying Commission-approved identification accompanies each shipment of medical cannabis or medical cannabis products that leaves the cultivation facility.
- (2) The Applicant's transportation agent will follow the procedures described below in order to ensure that all medical cannabis products are secure at all times during transport.

Safe and Secure Compartment



All medical cannabis will be transported inside a safe and secure locked compartment in the delivery vehicle. In cases where the vehicle does not have integral storage capability, all cannabis will be transported in a locked, tamper-proof container. The storage space and/or container will not be visible from outside the vehicle. Delivery vehicles will be equipped with GPS-tracking devices to ensure the cultivation facility maintains positive operating awareness at all times during delivery operations.



#### 10.62.18.06

108. Please describe how the Applicant will ensure that a medical cannabis transport vehicle shall have and display current registration from the State. \*

[Reference 10.62.18.06 of the regulations, Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

The Applicant's Packaging and Transportation Manager will be responsible for ensuring all vehicles transporting medical cannabis have current and appropriate vehicle registrations issued by the state of Maryland.

The Applicant's Packaging and Transportation Manager and all registered transportation agents will be responsible for ensuring current vehicle registrations are displayed at all times when the vehicles are transporting medical cannabis, returning to the cultivation facility after delivering

Application for Medical Cannabis Grower License



medical cannabis to a licensed cultivation, processing, or dispensary organization, or on the road for any other reason such as vehicle maintenance.

If the Applicant hires a licensed transport company to transport medical cannabis, the Applicant's Packaging and Transportation Manager will obtain proof that the transport vehicles have current vehicle registrations issued by the state of Maryland before allowing the company to transport the Applicant's medical cannabis.

## 109. Please describe how the Applicant will ensure that a medical cannabis transport vehicle will be insured as required by law. \*

[Reference 10.62.18.06 of the regulations. Graded Yes or No. Weighted 1% of Operational subsection. Maximum length 135 words]

The Applicant's Packaging and Transportation Manager will ensure that all medical cannabis transport vehicles will be properly and fully insured as required by Maryland law. All policy premiums will be current and paid in full. The Applicant's registered transport agents will carry proof of vehicle insurance at all times when transporting medical cannabis, returning to the cultivation facility after delivering medical cannabis to a licensed cultivation, processing, or dispensary organization, or on the road for any other reason such as vehicle maintenance, and will make proof of insurance available to the Commission and local and state law enforcement upon request.

If the Applicant hires a licensed transport company to transport medical cannabis, the Applicant's Packaging and Transportation Manager will obtain proof of vehicle insurance before allowing the company to transport the Applicant's medical cannabis.

# 110. Please describe how the Applicant will ensure that a medical cannabis transport vehicle will not display any sign or illustration related to medical cannabis or a Licensee. \*

[Reference 10.62.18.06 of the regulations. Graded Yes or No. Weighted 0.5% of Safety and Security subsection. Maximum length 70 words]

The Applicant will use its own medical cannabis transport vehicles to safely and securely transport medical cannabis from our facility to receiving licensees. Each of the Applicant's medical cannabis transport vehicles will have and display a current Maryland registration, will be insured as required by law, and will be plain, without any sign or illustration related to medical cannabis or our company.

#### 10.62.32.02

111. Please describe how the Applicant will maintain, independent of the inventory control, a searchable, secure, tamper-evident record of each distribution that contains (1) the name and address of the recipient, (2) the quantity delivered, and (3) the name, strength, batch number, and lot number of the product. \*

[Reference 10.62.32.02 of the regulations. Graded 0 to 5 scoring. Weighted 2.5% of Safety and Security subsection. Maximum length 340 words]

(1) [Reference 10.62.32.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]



(2) [Reference 10.62.32.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

(3) [Reference 10.62.32.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

The Applicant will use electronic shipping manifests to maintain, independent of the inventory control, a searchable, secure, tamper-evident record of each distribution.

The first step in any delivery will be the completion of an electronic shipping manifest that records the chain of custody for shipments containing medical cannabis. Our electronic shipping manifest will include:

- Name and address of the shipping licensee
- Shipping licensee's shipment identification number
- Weight and description of each individual package that is part of the shipment, and the total number of individual packages
- · Name of the registered agent who prepared the shipment
- Name and address of the receiving licensee or other receiving party
- Handling or storage instructions

A copy of the manifest will be carried by the transportation agent and will be available for law enforcement review before, during, and after transport.

The transportation agent and the receiving facility's agent will sign the manifest, indicating that custody of the medical cannabis has been safely transferred from the custody of the cultivation facility to that of the receiving facility.

After transport, the electronic manifest will be updated to contain:

- An entry by a shipping licensee's transportation agent of the date and time of the placement of the shipment into the medical cannabis transport vehicle
- An entry by licensee's agent receiving the shipment including the date and time of the acceptance
- If any other person had custody or control of the shipment, that person's identity, the circumstances, duration, and disposition

All electronic shipping manifests will be saved and stored onsite in a secure file for at least five years from date of delivery and show a true, accurate, legible, and complete statement of terms and conditions on which each purchase was made and delivered. Any and all changes to the manifest will be recorded, including the identity of the party making such changes, to record any evidence of potential tampering. The shipping manifests will also be stored off-site at a records management company. When necessary, emergency retrieval services are available to ensure quick access and compliance with Commission requests.

(1) The Applicant will use electronic shipping manifests to maintain, independent of inventory control, a searchable, secure, tamper-evident record of each distribution. Transportation agents

Application for Medical Cannabis Grower License



complete each manifest and obtain Packaging and Transportation Manager approval before loading, transporting, or delivering medical cannabis. The transportation agent will input the name and address of the recipient found on the purchase order submitted by the receiving licensee to complete that portion of the manifest.

- (2) Applicant will use electronic shipping manifests to maintain, independent of inventory control, a searchable, secure, tamper-evident record of each distribution. Transportation agents complete each manifest and obtain Packaging and Transportation Manager approval before loading, transporting, or delivering medical cannabis. Transportation agents will input the quantity delivered originally found on the purchase order and packaging log and confirmed during the loading/delivery process to complete that portion of the manifest.
- (3) Applicant will use electronic shipping manifests to maintain, independent of inventory control, a searchable, secure, tamper-evident record of each distribution. Transportation agents complete each manifest and obtain Packaging and Transportation Manager approval before loading, transporting, or delivering medical cannabis. The transportation agent will input the name, strength, batch number, and lot number of the product per the purchase order and packaging log to complete that portion of the manifest.
- 112. Please describe how, upon request, the Applicant will provide in a reasonable time and manner to a certifying physician a copy of the record of each distribution by the Licensee to a qualifying patient of the certifying physician of the quantity delivered, name, strength, batch number and lot number of medical cannabis. \*

[Reference 10.62.32.02 of the regulations. Graded 0 to 5 scoring. Weighted 1% of Production Control subsection. Maximum length 70 words]

Because we do not propose locating a dispensary at the cultivation facility, we will not distribute medical cannabis directly to qualifying patients. We will only distribute to registered dispensary and processing operations. As such, we will provide the name, strength, quantity, and batch number, and lot number of medical cannabis delivered—as well as any other required information—only for shipments received by these customers. This question is not applicable.

113. Please describe how the Applicant will shall retain the records of production and distribution of each batch and lot and of daily checklists to maintain uniformity from batch to batch, and lot to lot. \*

[Reference 10.62.32.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

The Applicant will store all records of production and distribution of each batch and lot and of daily checklists to maintain batch and lot uniformity in a locked filing cabinet and/or a password-protected computer in the Cultivation Manager's office. All hard and digital testing methods and results records will be kept for a minimum of five years and will be made available for inspection by the Commission upon request.



114. Please describe how the Applicant will maintain a record of test methods and test results for each batch and lot, including graphs, charts, or spectra from laboratory instrumentation. \*

[Reference 10.62.32.02 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection.

## 115. Please describe how the Applicant will maintain a log of individuals visiting each premises. \*

[Reference 10.62.32.02 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

Visitors will be required to sign a logbook registering:

- The visitor's name
- The visitor's government-issued identification number (e.g., driver's license number)
- The date
- · The time in and out of the facility
- The visitor's signature

Logbook entries will be scanned as .pdf files to create digital backup logbook records.

As the visitor is completing the logbook, a cultivation facility agent will photocopy the visitor's government-issued identification card. These photocopies will accompany visitor logbook entries and will also be scanned as .pdf files to create digital backup records.

Logbook entries and photocopied government-issued identification card documentation will be stored in a secure, locked filing cabinet, and digital backup records will be stored on a password protected computer, both in the Cultivation Manager's office. All hard and digital records will be kept for a minimum of five year.

## 116. Please describe how the Applicant will maintain a duplicate set of all records at a secure, off site location. \*

[Reference 10.62.32.02 of the regulations. Graded Yes or No. Weighted 1% of Safety and Security subsection. Maximum length 135 words]

The Applicant will contract a records management company, such as Iron Mountain, to provide off-site storage of all physical (i.e., hard-copy), digital, and video surveillance records. The security and alarm systems at such companies are extensive, and generally include intrusion detection, physical access controls, fire detection and suppression systems, server and data encryption, and 24-hour central monitoring. In addition, these facilities are specially constructed to be resistant to seismic activity, tornadoes, hurricanes, and other natural and manmade disasters, and offer environmental control systems to ensure the physical preservation of all physical and digital records and prevent any undue wear or decay. When necessary, next-day, half-day, and emergency retrieval services are available to ensure quick access and compliance



with Commission requests.	

### 10.62.32.03

117. Please describe how the Applicant will assure that, unless otherwise specified, a Licensee, or a certifying physician shall retain a record for a period of 5 years. \*
[Reference 10.62.32.03 of the regulations. Graded Yes or No. Weighted 0.5% of Production Control subsection. Maximum length 70 words]

The Applicant will maintain records that include operating procedures, inventory records, seed-to-sale tracking records, personnel records, business records, waste disposal records, as well as any documentation required by state law and rules and regulations for at least five years. All records will be made available to the Commission for review upon request. Records will be kept onsite at a secure location and offsite at a secure, contracted records management company.

**END OF DOCUMENT**